

IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE
FOR THE MIDDLE DISTRICT
NASHVILLE DIVISION

JANE DOE,
Plaintiff,
v.
THE METROPOLITAN
GOVERNMENT OF NASHVILLE AND
DAVIDSON COUNTY, TENNESSEE
AND DR. ADRIENNE BATTLE
Defendants.

No. 3:20-CV-01023
Jury Demand
Judge Trauger
Magistrate Judge
Holmes
Lead Case

DR. LILY MORENO LEFFLER,
Plaintiff,

v.
THE METROPOLITAN
GOVERNMENT OF NASHVILLE AND
DAVIDSON COUNTY, TENNESSEE,
AND DR. ADRIENNE BATTLE
Defendants.

DR. JAMES BAILEY,
DR. PIPPA MERIWETHER, and
DR. DAMON CATHEY,
Plaintiffs,

v.
METROPOLITAN GOVERNMENT
OF NASHVILLE AND DAVIDSON
COUNTY, TENNESSEE and
DR. ADRIENNE BATTLE,
Defendants.

The Deposition of: MARY ELLEN ZANDER
May 4, 2022

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

JANIE W. GARLAND
Briggs & Associates
222 Second Avenue North, Suite 340M
Nashville, Tennessee 37201
(615) 714-5350

1 The deposition of Mary Ellen Zander was
2 taken by counsel for the Plaintiffs, by notice, in
3 Nashville, Tennessee, on May 4, 2022, pursuant to the
4 provisions of the Federal Rules of Civil Procedure.

5 All formalities as to notice, caption,
6 certificate, reading and signing of the deposition
7 are not waived. All objections, except as to the
8 form of the questions, are reserved to the hearing.
9 -----

10 APPEARANCES:

11 For the Plaintiffs:

12 Dr. James Bailey
13 Dr. Lily Leffler
14 Dr. Pippa Meriwether
15 Jane Doe

16 Ann Buntin Steiner
17 Attorney at Law
18 Steiner & Steiner, LLC
19 613 Woodland Street
20 Nashville, TN 37206
21 asteiner@steinerandsteiner.com

22 For the Plaintiff:

23 Dr. Damon Cathey

24 Jesse Ford Harbison
25 Attorney at Law
26 Jesse Harbison Law, PLLC
27 P.O. Box 68251
28 Nashville, TN 37206
29 jesse@jesseharbisonlaw.com

30 For the Defendants:

31 J. Brooks Fox
32 Department of Law
33 Metropolitan Courthouse, Suite 108
34 P.O. Box 196300
35 Nashville, TN 37219
36 brooks.fox@nashville.gov

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX

Examination by Ms. Steiner	Page 5
Examination by Ms. Harbison	Page 95
Redirect Examination by Ms. Steiner	Page 125

EXHIBITS

No. 1 (Late-filed) All e-mail correspondence between Kevin Klein and Ms. Zander .	Page 43
No. 2 E-mail 6/24/20 from Ms. Zander to Dr. Bailey	Page 48
No. 3 (Two Pages) from Support Employee Handbook	Page 74
No. 4 5/4/20 letter to Dr. Bailey from Dr. Battle	Page 84
No. 5 6/21/20 letter (ID only)	Page 85
No. 6 Investigative Summary Form	Page 110

1 MARY ELLEN ZANDER,
2 called as a witness and, having been first duly
3 sworn, was deposed as follows:

4 EXAMINATION BY MS. STEINER:

5 Q. Could you please state your full name for
6 the record?

7 A. Mary Ellen Zander, is my maiden name. I
8 just recently got married, so it's Mary Ellen Munoz.
9 I'm just in the process of getting it all changed.

10 Q. And how do you spell your last name?

11 A. The new last name?

12 Q. Yes.

13 A. M-U-N-O-Z.

14 Q. Congratulations.

15 A. Thank you.

16 Q. And what is your home address?

17 A. [REDACTED] Nashville.

18 Q. How long have you lived there?

19 A. Not quite a year yet.

20 Q. Are you buying?

21 A. Say that again.

22 Q. Are you leasing or are you buying?

23 A. No. We own.

24 Q. Own it? Do you have any plans of moving
25 in the near future?

1 A. Not that I'm aware of.

2 Q. Do you have any plans of leaving your job
3 at Metro Schools in the near future?

4 A. No.

5 Q. So when we try this case on December 6th,
6 if I issue a subpoena, I can find you either at
7 Metro schools or at [REDACTED] [REDACTED] [REDACTED], correct?

8 A. Yes.

9 Q. Okay. Now, have you ever given a
10 deposition before?

11 A. Yes.

12 Q. How many times?

13 A. Half dozen at least.

14 Q. Were they in discrimination cases?

15 A. I can't remember if all of them were
16 discrimination cases. No. They were not all
17 discrimination cases.

18 Q. Were they cases that involved Metro
19 schools?

20 A. No, not all of them. I've only been to
21 one deposition involving Metro schools.

22 Q. Which one was that?

23 A. Last week.

24 Q. What was the name of the case?

25 A. George Brooks.

1 Q. Okay. With an S on the end of Brooks?

2 A. Yes.

3 Q. And what was that case about?

4 A. He -- I believe he is filing a claim
5 against the district, some kind of timing issue with
6 employment action.

7 Q. Is it a discrimination case?

8 A. I don't believe so.

9 Q. Did he have a contract with the district?

10 A. He was a teacher in the district.

11 Q. Was he nonrenewed?

12 A. He was terminated or he resigned in lieu
13 of being terminated.

14 Q. Did he sue saying that it was a wrongful
15 resignation -- termination?

16 A. He resigned, so I can't tell you exactly
17 what the suit was for.

18 Q. Is it in federal court?

19 A. I don't know.

20 Q. Is it in state court?

21 A. I did a local deposition last week. I
22 don't believe I understand whether it's in federal
23 or state at this point.

24 Q. What were you questioned about?

25 A. I am the employee relations director, and

1 I was asked about documents and basically the
2 letters recommending his termination, so it was
3 regarding his termination from the district.

4 Q. And did he claim he was terminated
5 wrongfully?

6 A. Not that I'm aware of.

7 Q. So he filed a lawsuit and you're the
8 employee relations director and you testified last
9 week, you don't know what it was about?

10 A. I'm not sure exactly what it was about. I
11 just --

12 Q. What do you think it was about?

13 A. I knew it had to do with his separation
14 from the district, but I started in 2018, his case
15 originated in 2017, I was just at the tail end of
16 the situation with Mr. Brooks.

17 Q. So when did you start with the district in
18 2018?

19 A. June 22nd, 2018.

20 Q. Okay. Tell me a little bit about
21 yourself. Are you from Davidson County?

22 A. I was born and raised in Torrington,
23 Connecticut, moved to Tennessee in 2000 with my
24 husband. He passed away.

25 Q. Okay.

1 A. I moved out to South Carolina in 2008,
2 returned to Tennessee in 2018.

3 Q. Did you have any HR experience before you
4 went to work for Metro schools?

5 A. Yes.

6 Q. How?

7 A. I was -- worked for Walmart prior to
8 coming to Metro schools. I was a market human
9 resource manager for Walmart. I handled the
10 Charleston market, basically it was about 16 stores
11 that I was the market HR manager for, for Walmart.

12 Prior to that, I worked for a Tennessee
13 organization, SMS Holdings.

14 Q. How did you spell that?

15 A. SMS Holdings.

16 Q. Okay.

17 A. I was director of HR services.

18 Q. And what before that?

19 A. I was a personnel and payroll manager for
20 Larc, L-A-R-C. It was a not-for-profit organization
21 that supported people with disabilities in
22 Connecticut. That was prior to moving down here.

23 Q. What is your educational background?

24 A. I have a bachelor's of science in early
25 childhood education and family studies.

1 Q. Were you going to be a teacher?

2 A. I actually did teach a couple of years
3 after college.

4 Q. Did you teach in Connecticut?

5 A. Yes.

6 Q. Okay. Did you have a license to teach in
7 Connecticut?

8 A. I was not certified. I did preschool.

9 Q. Did you need a license to do preschool
10 then in Connecticut?

11 A. No.

12 Q. Did you try to get a license in
13 Connecticut?

14 A. No.

15 Q. You just wanted to teach preschool?

16 A. That's what I went to school for and
17 that's what I did for about two years.

18 Q. Two years. Okay. Are you certified by
19 any agencies like SHRM?

20 A. I had a senior HR professional
21 certification, but it lapsed. I got it in 2006, and
22 I think in 2018, I did not renew it.

23 Q. Do you have any other certifications?

24 A. No.

25 Q. Did you receive any training on HR?

1 A. On-the-job training.

2 Q. Did you receive any specialized training
3 when you went to work for Metro schools?

4 A. The training that they put you through in
5 terms of sexual harassment and policies and that
6 kind of stuff. Some one-on-one training with the
7 interim director.

8 Q. And who was the interim director?

9 A. When I took over, it was Frank Young.

10 Q. What month did you go to work for Metro
11 schools in 2018?

12 A. June.

13 Q. Who was the HR director before you?

14 A. The interim director was Mr. Young. Prior
15 to that was Scott Lindsay.

16 Q. Who was the employee relations director
17 before you; was that Mo Carrasco?

18 A. No. I never met Mo, so I don't know what
19 his role -- but Scott Lindsay was the prior -- I
20 think his title was executive director at the time.

21 Q. Did you have any discussions with Mr.
22 Lindsay about your job?

23 A. No. He wasn't there when I got there.

24 Q. Did you know -- when you got there, did
25 anyone at Metro schools tell you about the working

1 environment that you were going into?

2 A. I think that in the interview process I
3 was told that there were issues ongoing, but I don't
4 know that anybody could have prepared me for
5 everything that was going on at the time I arrived.

6 Q. Did anyone tell you there were multiple
7 discrimination claims against the district and
8 that -- did anyone tell you that?

9 A. I don't remember anybody telling me that.

10 Q. Did anyone tell you that there was an
11 atmosphere of fear of retaliation that existed?

12 A. I don't know that anybody told me that.

13 Q. Did you know that Scott Lindsay believed
14 that the employees at Metro schools were petrified
15 for their jobs if they had to come in and testify or
16 were questioned about discrimination or retaliation
17 claims?

18 A. I don't know what Scott Lindsay thought.

19 Q. Did anyone at Metro schools ever tell you
20 that a fear of that nature existed?

21 A. I don't know that anybody ever told me
22 that.

23 Q. So then my next question is this. Do you
24 know of anything that was done by Metro schools to
25 correct any sort of fear?

1 A. I can't speak to what others have done
2 regarding that here.

3 Q. I want to know what you know have done --
4 has occurred. What do you have knowledge of in
5 terms of Metro schools doing anything to correct
6 this fear of retaliation that existed down there
7 when you became the employee relations director?

8 MR. FOX: Objection to the form.

9 THE WITNESS: The only thing that we do is
10 on a case-by-case basis. If people have concerns,
11 then we ensure them that we will do everything that
12 we can to prevent retaliation, and if retaliation
13 occurs, it's subject to corrective or disciplinary
14 action.

15 BY MS. STEINER:

16 Q. When you came in as an employee relations
17 director for Metro schools, if there was this fear
18 out there that was so prevalent that Scott Lindsay
19 even swore under oath that people were scared for
20 their jobs if they gave evidence or gave statements
21 in a case, should that have been brought to your
22 attention?

23 MR. FOX: Objection to the form.

24 THE WITNESS: I don't know. I don't know
25 that people would share preconceived perceptions. I

1 don't know. I think you have a misunderstanding of
2 my role. Employee relations isn't -- I oversee
3 harassment, discrimination, any protected class
4 issues, but we don't always get involved in the
5 day-to-day cultural issues.

6 BY MS. STEINER:

7 Q. Do you not agree that if the employees --
8 do you investigate harassment and discrimination
9 claims?

10 A. Yes.

11 Q. Would you not agree that if the employees
12 you were questioning about whether or not there's
13 been harassment or discrimination have a fear of
14 retaliation, it would affect your investigation?

15 A. Do I believe it would affect my
16 investigation? I would assure them that I would do
17 my best to protect them from retaliation.

18 Q. And what would that be?

19 A. Well, when we do reporting, we report to
20 the level up over, so like the leadership is aware
21 of the situation, the individual is given our
22 contact information and they can contact us if
23 anything happens so that we can address it as it
24 occurs.

25 Q. Do you ever do anything pre-protection?

1 If someone comes to you, for instance, Dr. Battle,
2 and says, I think I'm going to be retaliated against
3 by Dr. Battle because of what I did to her brother,
4 having to discipline her brother, what would you do
5 to set up as a precautionary measure to make sure
6 that doesn't occur?

7 A. Well, that's a -- Dr. Bailey never came to
8 me and said that, so I was not aware of anything
9 like that. It depends on the situation. If
10 somebody files a complaint and they work closely
11 with that individual on a daily basis, we might find
12 it appropriate to put somebody on an administrative
13 leave until the situation can be thoroughly
14 investigated and work towards a resolution.

15 Q. Any other options that you would have out
16 there to protect someone from retaliation?

17 A. At times, I think it's been known to
18 separate the individual. Even if they return to
19 work, we can restrict interaction between
20 individuals. If there was an issue involving Dr.
21 Battle, it would not be my department that would
22 handle that. That would be outsourced to a
23 third-party investigator.

24 Q. And in your time at Metro schools, do you
25 know of any outsourcing of any complaints of

1 retaliation by Dr. Battle that were outsourced?

2 A. I don't know for certain. I can't
3 remember.

4 Q. When you say administrative leave or
5 separate the individual, who was placed on
6 administrative leave, the harasser or the person who
7 is claiming harassment?

8 A. The person who the claim is made against.

9 Q. Okay. And when you separate the people,
10 how do you do that, who do you move, do you move
11 one, do you move both or what?

12 A. It depends on the circumstances. If the
13 person that files the complaint is requesting to be
14 moved to somewhere else or reassigned, then
15 otherwise we would move the person the claim was
16 filed against. It might be temporary. It might be
17 a permanent reassignment, depending on the
18 circumstances or situation.

19 Q. Can you tell me how many employees you've
20 actually placed on administrative leave due to a
21 complaint being filed against them, since you've
22 been the employee relations director?

23 A. I can't give you a number exactly. It's
24 been many.

25 Q. Meaning it's over like 20?

1 A. Yes.

2 Q. Okay.

3 A. But people go on administrative leave for
4 more than harassment or discrimination claims. If
5 there is an allegation of abuse or neglect of a
6 child, that would warrant administrative leave, so
7 there's a lot of different things that would warrant
8 administrative leave.

9 Q. I wanted to limit it to discrimination
10 claims, retaliation claims. How many individuals
11 have you placed on administrative leave due to an
12 administrative -- due to a discrimination or
13 retaliation claim?

14 A. I cannot recall that number. I mean, I've
15 been there since 2018, so I can't --

16 Q. Have you placed anyone on administrative
17 leave due to a harassment complaint?

18 A. Yes. I can remember at least one.

19 Q. And who was that?

20 A. It was just recently. A teacher was
21 alleged to have sexually harassed another teacher.

22 Q. Okay. Besides that one, can you remember
23 or recall any time that you have actually placed an
24 employee on administrative leave due to a
25 discrimination or retaliation claim?

1 A. I can't remember. Somebody -- that was
2 the most recent.

3 Q. Now, if a -- how many employees report to
4 you?

5 A. How many employees in my department report
6 to me? Four.

7 Q. And who are they?

8 A. Denetra Batey. (Court reporter asks for
9 clarification) D-E-N-E-T-R-A, B-A-T-E-Y. Wyntress,
10 W-Y-N-T-R-E-S-S Patterson. Frank Young and Barbara
11 Biggers-Matthews, Biggers, hyphen, Matthews.

12 Q. And what are they positions?

13 A. Denetra and Wyntress are employee
14 relations managers. Mr. Young is the legal liaison.
15 He is an attorney. And Ms. Biggers-Matthews is the
16 admin assistant for a department.

17 Q. Okay. So if someone brings a complaint of
18 retaliation or fear of retaliation to either Ms.
19 Batey or Ms. Patterson, should they bring that to
20 your attention?

21 A. We discuss our cases weekly. So I might
22 be aware, depending on if it's a regular teacher or
23 a paraprofessional, maybe not, but if it's somebody
24 like a principal or higher, I would be made aware.

25 Q. Okay. Were you made aware of the fact

1 that Mr. James Bailey made a complaint of fear of
2 retaliation to Ms. Batey in, I believe April of
3 2018 -- of 2020?

4 A. I don't remember that specifically.

5 Q. If Dr. Bailey had gone to Ms. Batey and
6 said, I'm petrified that I'm going to be retaliated
7 against by Dr. Battle because she is now the
8 director of schools and I think she is out to get me
9 because of my discipline of her brother, what should
10 Ms. Batey should have done?

11 A. She would have raised the concern to me
12 and we would have raised it to the chief human
13 resources office on guidance how to handle it.

14 Q. And was that ever raised with you?

15 A. I think I was aware of it, I just don't
16 remember specifically the timing of any of that.

17 Q. You were aware of the fact that Dr. Bailey
18 had a fear of retaliation when Dr. Battle became
19 director of schools?

20 A. I don't know exactly what Dr. Bailey was
21 afraid of.

22 Q. But you had knowledge of something going
23 on, correct?

24 A. Yes. That might be more accurate. I knew
25 something was going on, but I didn't know

1 specifically what was going on.

2 Q. And when you knew something was going on,
3 did you have a job duty for inquiring as to what was
4 going on?

5 A. Like I said, if the allegation was made
6 against Dr. Battle, it would had to have been
7 outsourced to a third party.

8 Q. And would it have been outsourced
9 immediately to the third party?

10 A. Depending on the statement. If something
11 had occurred or if it was in anticipation that
12 something would occur.

13 Q. If it's an anticipation that something
14 would occur, what happens?

15 A. I can't speak to that. It depends on the
16 circumstances or situation.

17 Q. Okay. Here's the circumstance.
18 Dr. Bailey is principal at White's Creek, he has a
19 fear that Dr. Battle is going to retaliate against
20 him because of his discipline of her brother and he
21 brings that to your department, what happens?

22 A. We have to ask for specifics on what
23 grounds and whatever, but then again, if it was
24 against Dr. Battle, it would have to be looked into
25 by somebody outside of our organization.

1 Q. Would you agree that if -- your department
2 does have the ability to protect employees from
3 retaliation, correct?

4 A. What do you mean, protect?

5 Q. Stop retaliation.

6 A. If it's within the school or within the
7 work environment, yes. We would be able to work
8 with leadership to restrict interaction and take
9 appropriate action against somebody who is found to
10 have retaliated. If it's something that happens
11 outside of the school boundaries, we have very
12 limited ability to -- we would recommend that they
13 go to the authorities if there was a situation
14 outside of the school environment.

15 Q. Can you tell me everything that Metro
16 schools did to protect Dr. Bailey from retaliation
17 by Dr. Battle?

18 A. I have -- I can't speak to that.

19 MR. FOX: Objection to the form.

20 BY MS. STEINER:

21 Q. Can you tell me anything Metro schools did
22 to protect Dr. Bailey from retaliation from Dr.
23 Battle?

24 MR. FOX: Objection to the form.

25 THE WITNESS: I can't answer that

1 question. I don't know.

2 BY MS. STEINER:

3 Q. Now, when you came here for your
4 deposition today, did you know it was for a lawsuit
5 where Dr. Bailey's claiming he lost his job or he
6 was retaliated against because of his actions
7 against Dr. Battle's brother; did you know that?

8 A. I knew that you were the attorney for
9 multiple individuals. I didn't realize it was going
10 to be regarding Dr. Bailey.

11 Q. Did you know Dr. Bailey was one of the
12 individuals?

13 A. Yes, I did.

14 Q. Well, when you knew that, did you go back
15 to look to see whether or not he had filed any
16 charge of retaliation?

17 A. No, I did not.

18 Q. Okay. Besides Dr. Bailey, can you tell me
19 anyone else who has made any sort of charge of
20 retaliation against Adrienne Battle?

21 MR. FOX: Objection to the form.

22 THE WITNESS: Can you ask that question
23 again?

24 BY MS. STEINER:

25 Q. Who else has made a charge of retaliation

1 or discrimination against Adrienne Battle that you
2 know of?

3 A. I'm not certain.

4 Q. Who do you think may have made a charge of
5 retaliation or discrimination against Adrienne
6 Battle?

7 A. I don't know that I'm comfortable
8 answering that question, I don't know that I know.

9 Q. If you have any idea you need to answer my
10 question today.

11 MR. FOX: Objection to the form.

12 THE WITNESS: I believe that there is
13 other named people and -- that I was made aware of
14 that this might be regarding, involved Pippa
15 Meriwether, Damon Cathey, Lily Leffler. Other than
16 that, I don't know if they specifically had claimed
17 discrimination against Dr. Battle or not. I just
18 knew that those were also other folks that you
19 represented.

20 BY MS. STEINER:

21 Q. Anyone else?

22 A. Not that I can think of.

23 Q. Now, if someone comes in to the employee
24 relations department and says I think I'm going to
25 be retaliated against, does your department have a

1 job duty, an obligation to question them about why?

2 A. Yes.

3 Q. And do you keep notes of that?

4 A. Yes, we would.

5 Q. So if Dr. Bailey were to go to Ms. Batey
6 and say I think I'm being retaliated against, she
7 would have a job duty for keeping notes and asking
8 him why, correct?

9 A. Yes.

10 Q. Okay. And she would have a job duty and
11 an obligation to report that to you in your weekly
12 meeting, correct?

13 A. She would raise that, yes.

14 Q. And when that's reported to you, do you
15 also question Ms. Batey about what's been done with
16 regard to his fear of retaliation?

17 A. Can you ask that again?

18 Q. When that is brought to your knowledge,
19 brought to you that Dr. Bailey is in fear of
20 retaliation, what do you do?

21 MR. FOX: Objection to the form.

22 THE WITNESS: I think we would raise that
23 concern and raise that concern with the chief human
24 resource officer at that time.

25 Q. And who was that?

1 A. We've had several. I believe it was
2 Dr. Barnes.

3 Q. Did you raise that with Dr. Barnes?

4 MR. FOX: Objection to the form.

5 THE WITNESS: I believe we did.

6 BY MS. STEINER:

7 Q. And do you keep notes of raising these
8 issues, what you've raised with Dr. Barnes?

9 THE WITNESS: Not necessarily, unless we
10 were discussing next steps or whatever, I would take
11 notes.

12 Q. So then you did not -- did you discuss
13 next steps with regard to Dr. Bailey and his fear of
14 retaliation?

15 A. I don't remember having that discussion.

16 Q. Can you tell me anything that was done to
17 protect Dr. Bailey from retaliation?

18 MR. FOX: Objection to the form.

19 THE WITNESS: I cannot recall what steps
20 were taken with Dr. Bailey.

21 BY MS. STEINER:

22 Q. Okay. And I assume you have no
23 investigative notes or no file open on Dr. Bailey's
24 fear of retaliation?

25 A. I don't have anything that I can remember.

1 Q. Okay. So is it correct then that a file
2 was not even opened on Dr. Bailey's statements that
3 he had a fear of retaliation?

4 A. I don't know that that would be true. I
5 don't know what Ms. Batey kept.

6 Q. Okay. Do you know what a nonrenewal is?

7 A. Yes.

8 Q. What is it?

9 A. It would be a nonrenewal -- are you
10 talking in terms of a teacher or are you talking in
11 terms of a principal?

12 Q. Principal.

13 A. So principals have a contract that is an
14 annual contract, and it's up for renewal every year,
15 so if they choose not to renew a principal contract,
16 that's at the discretion of the director of schools.

17 Q. Is a nonrenewal different than a transfer?

18 A. Yes.

19 Q. Okay. Do you know what a transfer is?

20 A. Yes. It's a very broad term. Transfer
21 would mean, you could transfer to another position
22 at another school, you transfer to a position of
23 equal stature at another location. People transfer
24 and get promotions, people transfer and take
25 demotions.

1 Q. If it's to a lower position with lower
2 pay, is that considered a demotion?

3 A. It would be. But the -- if the principal
4 is a tenured teacher, the position that they are
5 guaranteed within the district would be that of a
6 tenured teacher. There is no guarantee of placement
7 as a principal if the contract is nonrenewed.

8 Q. Now, if a contract is not renewed, that
9 means that they don't have the position with Metro
10 schools, correct? That's different than a transfer?

11 A. The -- if the principal position was
12 nonrenewed, they would not have a principal
13 position, but if they were tenured, they would be
14 guaranteed no less than a teaching position within
15 the district.

16 Q. And when they are told that their contract
17 is being nonrenewed or they're not going to be in
18 that position again, does the person telling them
19 that have a duty for telling them whether or not
20 they're tenured or not tenured and whether or not
21 they're going to be transferred into another
22 position?

23 A. I don't have those conversations. I don't
24 know what goes on in those conversations. I mean,
25 if you want me to speculate, I can speculate on what

1 would take place in those conversations.

2 MR. FOX: Objection to the form.

3 BY MS. STEINER:

4 Q. What would you expect? You're the
5 employee relations director, what would you -- how
6 do you train the individuals who are engaging in
7 these nonrenewals and terminations, how do you -- do
8 you train them to tell the employees what's going
9 on?

10 A. I don't train those individuals. I'm not
11 party to that process. That is handled by a
12 different leg of HR.

13 Q. Okay. So then do you have a job duty for
14 understanding and administering nonrenewals and
15 transfers and demotions?

16 A. That is not -- that does not fall under my
17 job duties.

18 Q. Okay. Did you know that Dr. Battle did
19 nonrenew Dr. Bailey's contract?

20 A. I understood that it was Dr. Sharon
21 Griffin that made the recommendation to nonrenew
22 Dr. Bailey's contract. Like I said, I wasn't party
23 to those conversations. And then I believe it was
24 supported by Dr. Battle.

25 Q. Did you know that within weeks of coming

1 in your office and claiming he had a fear of
2 retaliation, that he had lost his job as principal?

3 A. Say that again.

4 Q. Did you know that within weeks of coming
5 into your office to complain and to alert your
6 office of his fear of retaliation, he lost his job
7 as principal?

8 A. I don't know the timeline. Like I said, I
9 wasn't personally involved in that situation, but it
10 could have been weeks. I don't know. You're asking
11 me to speculate.

12 Q. Actually, I'm not. As the head of
13 employee relations, you're the one who is
14 responsible for the department investigating
15 complaints of retaliation, correct?

16 A. If they are based on a protected class,
17 yes.

18 Q. What about based on whistleblower
19 activity?

20 A. We've been asked to look into some of
21 those situations.

22 Q. And who asked you to look into those?

23 A. My boss.

24 Q. Who --

25 A. It depends. I have four different chief

1 human resources officers, so it could have been --
2 or Sharon Pertiller was my boss at one point. So if
3 I had been asked to look into something that
4 normally wouldn't fall into our realm, then I would
5 do that.

6 Q. So whistleblower retaliation normally does
7 not fall within your realm?

8 A. I can't recall, other than one case that I
9 looked into, that they alleged retaliation due to
10 them raising concerns or sharing information, that I
11 looked into.

12 Q. So then, in general, retaliation for
13 whistleblower activity is not typically handled by
14 your department?

15 A. Harassment, discrimination, retaliation
16 for protected class issues would be covered under
17 our department. If that was raised to us -- but,
18 again, it depends on who the subject is. If the
19 subject is someone within the HR department or the
20 director of schools, would have to outsource that.

21 Q. Let's go back. My question to you is a
22 little different. Does your department -- is your
23 department responsible for complaints of retaliation
24 for whistleblower activity?

25 A. I would say yes.

1 Q. So it doesn't have to be referred to you
2 for -- from Chris Barnes or someone else, your
3 department is responsible for that when an employee
4 walks in and tells you they are being retaliated
5 against for whistleblower, correct?

6 A. I don't know that any employee that walks
7 in and says they're being retaliated says it's for a
8 whistleblower. They would give us other reasons. I
9 think the only people that use the whistleblower
10 terms are people like yourself. So I don't know
11 that an employee would come in and say that because
12 I blew a whistle, they would raise concerns. We
13 would know the specifics of why they felt they were
14 being retaliated against.

15 Q. Do you understand what a whistleblower
16 claim is?

17 A. I do.

18 Q. Okay. And do you know that that includes
19 such things as what Dr. Bailey did when he
20 disciplined Coach Battle for beating up a parent and
21 mishandling funds?

22 MR. FOX: Objection to --

23 BY MS. STEINER:

24 Q. Do you understand that a whistleblower
25 claim would protect Dr. Bailey from retaliation for

1 doing that?

2 MR. FOX: Objection to the form.

3 THE WITNESS: I believe that if that was
4 the purpose or the -- if the person was being
5 disciplined based solely on that, then it would be
6 supported as a whistleblower, but if there are other
7 factors involved that resulted in an employment
8 action, it would be considered, but they would still
9 be subject to the same terms and conditions of
10 employment if say their performance wasn't where it
11 was supposed to be. Say the school wasn't
12 performing the way it was supposed to be, et cetera,
13 et cetera. It doesn't protect them from not doing
14 the things they are supposed to do in their role or
15 capacity.

16 BY MS. STEINER:

17 Q. Okay. But you do agree that it would
18 protect them from retaliation?

19 A. If the reason for the action was solely
20 retaliation, then that could be supported.

21 Q. Okay. Now, did Metro schools investigate
22 Dr. Bailey's complaint of retaliation?

23 A. I do not have a file from an attorney that
24 investigated a retaliation claim from Dr. Bailey.

25 Q. Do you know today whether or not

1 Dr. Bailey made a claim of retaliation?

2 A. I would have to go back and look and
3 research.

4 Q. Okay. So you're here today for your
5 deposition, you have no knowledge about whether or
6 not he even made a complaint of retaliation?

7 A. Correct.

8 Q. Now, Dr. Pippa Meriwether, do you know
9 whether or not she made a complaint of retaliation?

10 A. The only complaint that I'm aware of from
11 Dr. Meriwether was in the process of selection or
12 not being selected as an executive director. She
13 sent me a complaint, but basically said she didn't
14 want to investigate the complaint, she just didn't
15 want those things to happen to anyone else, and she
16 basically identified flaws in the process, whether
17 it was in her selection or not in her selection as
18 an executive director or in the selection of
19 principalship for the school she was applying for.

20 Q. Let me ask you a question. Did you know
21 that Dr. Lily Leffler was kin to Vanessa Garcia?

22 A. No, I did not.

23 Q. Okay. If you discovered that officials
24 were questioning an employee's loyalty to the
25 district because of her association with someone who

1 had sued the district for sexually hostile work
2 environment, what would you have done as the
3 director of employee relations?

4 MR. FOX: Objection to the form.

5 THE WITNESS: You're asking for
6 hypotheticals.

7 BY MS. STEINER:

8 Q. Yes, I am. I want to know what your
9 department, in its policies and procedures that it
10 has set up, would do in that situation.

11 A. So ask the question again, please.

12 Q. If you were to discover that officials at
13 Metro schools were questioning the loyalty of an
14 employee, based upon her relationship to someone who
15 has sued the employee for a sexually hostile work
16 environment, what would you do as an employee
17 relations director?

18 A. It would depend on who the official was
19 that was questioning the loyalty. I would have to
20 raise the concern to my boss, raise the concern to
21 the boss of the individual that was questioning the
22 loyalty, understanding the purpose of the
23 questioning or necessity of the questioning, but,
24 again, it all depends on who was involved, whether
25 or not I would be intimately involved or not.

1 Q. Okay. If you found out the official was
2 Dr. Battle, would you be involved in that?

3 A. Anything that has to do with Dr. Battle, I
4 would share it with the chair of the board and they
5 would address it. And they don't even respond back
6 to me if I raise a concern that's been shared to us
7 regarding Dr. Battle.

8 Q. When you say chairman of the board, what
9 board are you referring to?

10 A. The board of the Nashville -- Metro
11 Nashville Public School Board of Education.

12 Q. And who is the current chair?

13 A. I don't know.

14 Q. Is that the school board, is that what
15 you're referring to?

16 A. Yes.

17 Q. Okay. That Amy Frogge and -- that school
18 board?

19 A. Yes.

20 MR. FOX: Objection to the form.

21 BY MS. STEINER:

22 Q. Have you raised any concerns with anyone
23 on the school board about retaliation being
24 conducted by Dr. Battle?

25 A. I'm trying to remember the last concern I

1 had to raise to someone on the board, and it was
2 years ago, and to be honest with you, I don't
3 remember what the premise was. It involved Dr.
4 Battle, but it also involved someone else, so it was
5 raised with the school board.

6 Q. Who else did it involve?

7 A. I can't remember.

8 Q. Do you recall a principal that was let go
9 for sexual harassment?

10 A. I don't know what are you referring to.

11 Q. Sam Braden.

12 A. That happened -- he actually retired in
13 lieu of any recommendation going to the board for
14 his separation, based on the findings of an
15 investigation.

16 Q. Did you raise the -- were you there when
17 the Braden issue was going on?

18 A. I came in right about the same time that
19 was all happening. I was involved in an
20 investigation, but Dr. Braden was -- he had resigned
21 prior to us, I think even finishing the
22 investigation.

23 Q. Dr. Braden had engaged in very gross
24 actions of sexual harassment against individuals,
25 correct?

1 MR. FOX: Objection to the form.

2 THE WITNESS: There were some significant
3 allegations that were substantiated against him, but
4 I can't speak to them specifically.

5 BY MS. STEINER:

6 Q. That's what I mean, significant. And is
7 it a fair statement, too, that many of the people
8 who had complained of Dr. Braden's treatment, sexual
9 harassment of them, lost their jobs or were demoted
10 and filed lawsuits against Metro schools?

11 A. I don't know. I don't know that the folks
12 that filed complaints that I'm aware of have lost
13 their jobs. I believe one has been promoted, one is
14 still with the district. If they've left, they left
15 on their own accord or for another reason, but I'm
16 not aware of people that have left because they
17 filed a complaint. Like I said, it all started
18 happening when I first got here, so it was very --

19 Q. Were you aware that many of those who
20 people claimed retaliation, that they were demoted
21 or lost their jobs because they had complained about
22 Braden's treatment of them?

23 A. Was I aware?

24 Q. Yes.

25 A. No. Like I said, I came in on the tail

1 end of it when he was actually resigning.

2 Q. Okay. A lot occurred after he resigned,
3 though, correct?

4 A. There was a lot of press, media, you know,
5 interest.

6 Q. And when you came in on the tail end of
7 it, did you have any job duties for dealing or
8 investigating with the Braden situation?

9 A. I investigated one case with the Braden
10 situation.

11 Q. Who was that?

12 A. Stefan Williams.

13 Q. And what was his position with Metro
14 schools?

15 A. I believe at the time, he was a teacher.
16 I believe now he is an assistant principal.

17 Q. And did Mr. Williams claim he was
18 retaliated against?

19 A. Yes, but not by Dr. Sam Braden.

20 Q. Did he claim he was retaliated against by
21 the administration at Metro schools?

22 A. I think his allegation was that he was
23 retaliated against by Dr. Braden's wife, Sharon
24 Braden, who also no longer works for the district.
25 Resigned.

1 Q. Okay. Now, my understanding is that the
2 assistant principal there claimed he was demoted
3 because of his bringing forth to HR the complaints
4 against Braden?

5 A. I don't know who that is.

6 Q. In your investigation, did you ever come
7 across any allegations that the complaints against
8 Dr. Braden were brought to Dr. Battle?

9 A. Do I know they were brought to Dr. Battle?
10 I believe when the findings were reached, they were
11 shared with the hierarchy of HR who would share them
12 with Dr. Battle.

13 Q. Were you aware that Dr. Battle actually
14 was told early on about the complaints against Sam
15 Braden, and she said, he can't be guilty of that
16 because he taught me in grade school or high school?

17 MR. FOX: Objection to the form.

18 THE WITNESS: I don't know that she ever
19 said that.

20 BY MS. STEINER:

21 Q. Okay. Let me hand you this document, and
22 I only brought two. Can I show it to you and --

23 MR. FOX: We can share.

24 MS. STEINER: Thank you.

25 BY MS. STEINER:

1 Q. And this was sent to me.

2 A. Okay.

3 MR. FOX: Can we take a break so she can
4 look at this off the record?

5 MS. STEINER: Yes, that's fine.

6 (Brief break observed.)

7 BY MS. STEINER:

8 Q. Now, do you know whether or not other
9 individuals who have testified in this matter in a
10 deposition were in fear for their jobs?

11 MR. FOX: Objection to the form.

12 THE WITNESS: I'm not even sure what you
13 just asked.

14 BY MS. STEINER:

15 Q. Were you aware that some of the
16 individuals that came in to give depositions in this
17 case were in fear of their jobs?

18 MR. FOX: Objection to the form.

19 BY MS. STEINER:

20 Q. They thought they would be retaliated
21 against by Metro schools for their testimony?

22 A. I didn't know anybody else that's being
23 deposed for this.

24 Q. Are you in fear of retaliation?

25 A. No.

1 Q. Now, for this e-mail that was sent to you,
2 do you recognize this on the second page?

3 A. Yes.

4 Q. Second and third page. It's an e-mail
5 that was sent to you from Dr. Bailey on June 15,
6 2020; is that correct?

7 A. That's what it says, yes.

8 Q. Okay. And Dr. Bailey tells you in his
9 formal complaint of retaliation, age and race
10 discrimination against Dr. Battle; is that correct?

11 A. Yes.

12 Q. He tells you why the retaliation occurred;
13 is that correct? And it's based on his
14 participation in her brother's disciplinary action,
15 correct?

16 A. It says -- it's detailing why he believes
17 he was retaliated against.

18 Q. Do you see here where it says, Dr. Battle
19 alleges that my removal was due to the district's
20 reorg and budget impact; do you see that?

21 MR. FOX: I'm sorry, Ms. Steiner, which --

22 BY MS. STEINER:

23 Q. It's the fourth sentence in the e-mail.
24 Says, Although Dr. Battle alleges that my removal
25 was due to the district's reorg and budget impact,

1 she is replacing me with someone that's not in a
2 protected age group for the same role; do you see
3 that?

4 A. Yes.

5 Q. Did your department ask any questions to
6 find out what was the reason given by Dr. Battle for
7 the removal of Dr. Bailey?

8 A. Was I involved in that? No.

9 Q. Did your department do any questioning to
10 find out why Dr. Bailey was removed?

11 A. It was outsourced to Mr. Klein. (Court
12 reporter asks for clarification.) Mr. Klein, Kevin
13 Klein.

14 Q. Do you know what the results of that
15 investigation was?

16 A. No.

17 Q. Did you have any contact with Mr. Klein to
18 find out what had happened with that investigation?

19 A. I would follow up, I would tell him who he
20 would converse with, and I would give him contact
21 information because if it had to do with Dr. Battle,
22 the findings would go to the chairman of the board.

23 Q. How did you tell him this?

24 A. E-mail.

25 Q. Do you still have those e-mails?

1 A. I have no idea. I would imagine I do.

2 Q. Could you please provide those e-mails to
3 your counsel?

4 A. If I still have them, yes.

5 (WHEREUPON, the
6 previously-mentioned documents
7 were to be marked Late-filed
8 Exhibit Number 1.)

9 BY MS. STEINER:

10 Q. And in those e-mails to Mr. Klein, did you
11 tell him who you thought he should interview?

12 A. No.

13 Q. What was stated in these e-mails going
14 back and forth to Mr. Klein?

15 A. I don't remember.

16 Q. Because I thought you just testified that
17 there was -- you had information going back and
18 forth with him, conversations going back and forth,
19 asking him who he had interviewed?

20 A. No, I didn't say that.

21 Q. Okay.

22 MS. STEINER: Could the court reporter
23 read back that response. That was probably about
24 two minutes ago. Let's see what that was.

25 (Requested portion of record read.)

1 BY MS. STEINER:

2 Q. Ms. Zander, when you said, I would tell
3 him who he would converse with, what did you mean by
4 that?

5 A. I meant that he would share his results
6 with the chair, board chair, because that was the
7 person who ultimately was over Dr. Battle, or the
8 board is actually over Dr. Battle, so the results
9 would go to the chair, and that would be the contact
10 information that I would provide to him.

11 Q. And so then was a written report provided
12 to the chair?

13 A. I have no idea.

14 Q. Did he ask you for contact information for
15 any employees?

16 A. He may have. Like I said, I don't
17 remember specifically.

18 Q. Do you have -- that's something else, too.
19 Any e-mails that you had going back and forth with
20 Kevin Klein, I'd like that marked as an exhibit, if
21 that was not part of 1. I may have already asked
22 for that. All e-mails going back and forth with
23 Kevin Klein, Exhibit Number 1.

24 A. Around this time frame?

25 Q. Around this complaint of retaliation, I

1 don't care if it was six months later or a year
2 later, if it has anything to do with my client's
3 complaint of retaliation, I want a copy of it, okay?

4 A. Okay.

5 Q. So when you got this e-mail, June 15,
6 2020, besides talking to Kevin Klein, did you do
7 anything else about this e-mail?

8 A. I don't remember.

9 Q. Did you read the e-mail?

10 A. Yes.

11 Q. Now, when employees are placed in teaching
12 positions, do you know when the notices go out for
13 that?

14 A. No.

15 Q. Do you know if there is a particular
16 cut-off date, such as June 15th?

17 A. Because the next school year starts in
18 July, I believe they want to have all placements
19 done by June 15th. That sounds like a logical,
20 normal thing.

21 Q. If you're not placed by June 15th, is it
22 logical that you're not going to be placed?

23 A. No, not necessarily. It depends on what's
24 open, what's available, maybe something just opened
25 up.

1 Q. And if nothing opens up, then that teacher
2 does not have a job, correct?

3 A. I don't handle that piece of the
4 situation, so I don't understand the placement
5 pieces.

6 Q. Now, did Metro schools do anything at all
7 as a result of this June 15th, 2020 e-mail from Dr.
8 Bailey to protect him in his position as principal
9 at White's Creek?

10 A. Well, if he wrote this to me June 15th, he
11 was already nonrenewed, so at that point, I don't
12 know that there was -- that was already an action
13 that was taken. June 15th is when he sent it to me.
14 June 15th, that decision would have already been
15 made, so...

16 Q. If someone is nonrenewed for job
17 performance, are they typically let go of Metro
18 schools?

19 A. It's not typical. There isn't anything --
20 everything is valued on a case-by-case. If it's
21 performance because of the level, maybe they
22 wouldn't be good at a high school, but they'd be
23 okay at middle school or elementary school,
24 depending on what the situation is exactly.

25 Q. Do you know whether or not Metro schools

1 has access to know whether or not an employee has a
2 teaching certificate?

3 A. Yes.

4 Q. Okay. Is that true then that Metro
5 schools does have access to find out whether or not
6 its employees have teaching certificates?

7 A. I mean, it's available on TN Compass, so
8 they should be able to see if they have an active
9 license.

10 Q. Okay. And if someone does not have a
11 teaching license, can they be transferred into a
12 teaching position?

13 A. No.

14 Q. Now, so then after getting this complaint
15 from Dr. Bailey, this date of June 15, 2020, as you
16 sit here today, you have no idea whether or not it
17 was investigated or what was the result of the
18 investigation?

19 A. If it was outsourced to Mr. Klein, I'm
20 pretty confident that he investigated it. As to the
21 findings of that investigation, I don't remember if
22 I received them. I believe my recommendation was to
23 send them to the chair, board chair. I want to say
24 that might have been Anna Shepherd at the time,
25 but -- because I remember conversing with

1 Ms. Shepherd, telling her that this would be coming,
2 but if it went to Ms. Shepherd, I never got any
3 follow-up.

4 Q. Okay. Could we have this marked Exhibit
5 Number 2 to your deposition?

6 (WHEREUPON, the
7 previously-mentioned document was
8 marked as Exhibit Number 2.)

9 BY MS. STEINER:

10 Q. Did you hear about this Let's Make a Slave
11 lesson that was taught at Waverly Belmont?

12 A. I recall something about that, yes.

13 Q. Did you know that one of the children who
14 was in the classroom that was taught that lesson
15 worked for Metro schools, one of the parents of the
16 child?

17 MR. FOX: Objection to the form.

18 THE WITNESS: I think I later learned that
19 one of the student's parents worked for Metro
20 schools.

21 BY MS. STEINER:

22 Q. Did you learn the name of the parent?

23 A. Only because of the complaint that was
24 filed with Ms. Batey.

25 Q. What was the name of the parent?

1 A. I believe it was (name spoken off record).

2 Q. When she filed the complaint with
3 Ms. Batey, what did it state?

4 A. I don't know specifically.

5 Q. Did she claim that the lesson was racial?

6 A. I believe that there was some racial
7 inferences. I believe that was her concern with the
8 student being subjected to the class.

9 Q. Okay. So that came to Ms. Batey and she
10 investigated it?

11 A. I believe she worked with school
12 leadership to investigate it.

13 Q. And that's because you do not want
14 discriminatory lessons taught to the students,
15 correct?

16 A. I think that discrimination and harassmt
17 are a real part of the world. I think there is a
18 time and place where there is an education that
19 needs to take place of lessons that are
20 discriminatory. I believe -- or can be viewed as or
21 perceived as, they should be well vetted before they
22 ever go in front of a student.

23 Q. And so did the complaint that Ms. -- and
24 I'm going to call her Jane Doe for the rest of this
25 deposition; is that okay with you? When I say Jane

1 Doe, you know I'm referring to (name spoken off
2 record)?

3 A. Okay.

4 Q. So then Jane Doe brought it to Ms. Batey's
5 attention that she felt that the lesson plan, Let's
6 Make a Slave, was discriminatory?

7 A. I'm not sure exactly what (name spoken off
8 record) bought to Ms. Batey.

9 MR. FOX: Objection. I think we're saying
10 Jane Doe.

11 BY MS. STEINER:

12 Q. I'm sorry. Was it your understanding that
13 Jane Doe brought to Ms. Batey's attention that she
14 thought the lesson that was taught to her son was
15 discriminatory?

16 A. I don't know what Ms. Doe told Ms. Batey
17 regarding her claim. I don't know if what Ms. Doe
18 reported to Ms. Batey was the situation involving
19 the student or the action taken with her alleging
20 that it might have been retaliation for her concern
21 about raising her concern about her student. Again,
22 I'm not intimately familiar with that.

23 Q. So then it's your understanding that Ms.
24 Doe brought to Ms. Batey's attention that she
25 thought she was being retaliated against because of

1 her complaints of Let's Make a Slave lesson,
2 correct?

3 A. I don't know exactly what the name of the
4 lesson was, I know that the complaint had something
5 to do with her and I believe she felt it was as a
6 result of her speaking up about the lesson with her
7 son.

8 Q. And did Ms. Batey bring that to your
9 attention in these weekly meetings that you would
10 have with her?

11 A. Probably.

12 Q. In these weekly meetings, do you keep
13 notes of what's said to you?

14 A. They have notes on their files. I would
15 just ask for updates on their investigation, where
16 they were.

17 Q. When you say you asked for updates, are
18 those oral or written?

19 A. Yes. We sit around a table and we discuss
20 open cases.

21 Q. Did you discuss Jane Doe's complaint of
22 retaliation?

23 A. Possibly. I don't remember specifically.

24 Q. Who was on the table with you?

25 A. If I'm having a conversation about that,

1 it would have to have been with Ms. Batey. I don't
2 know who else would have been there at the time.

3 Q. And do you know whether or not an
4 investigation was conducted to see if it was
5 retaliation?

6 A. If I came to Ms. Batey, I believe Ms.
7 Batey did do the investigation.

8 Q. Did she go out then to -- when you do an
9 investigation, are your employees trained to go out
10 and interview witnesses?

11 A. Yes. We interview witnesses.

12 Q. Do you keep notes on what's said in the
13 interviews?

14 A. Yes.

15 Q. And do you then come to some conclusion
16 that's written?

17 A. If we're handling the investigation, yes,
18 we would come up with a summary.

19 Q. Have you come up with any summary that
20 you've seen on Jane Doe's complaint of retaliation?

21 A. I don't -- I don't remember, but -- and I
22 hate to assume, but if Ms. Batey handled the
23 investigation, there is a summary.

24 Q. And do you recall any outsourcing of this
25 claim by Jane Doe to any other individuals, such as

1 Kevin Klein to investigate?

2 A. I don't believe so.

3 Q. Is it the standard protocol and policy of
4 your office that when a complaint of retaliation
5 comes in, it is investigated, the witnesses are
6 interviewed and documentation is kept?

7 A. Yes.

8 Q. And when the witnesses are interviewed, do
9 you typically try to keep statements that the
10 witnesses actually will sign?

11 A. If it's a face-to-face interview, we give
12 them an opportunity to review the notes. If it's a
13 Teams, and they request to review the notes, we
14 share them with them.

15 Q. Can you tell me anyone who was interviewed
16 by Metro schools concerning Jane Doe's complaint of
17 retaliation?

18 A. I don't know.

19 Q. Did anyone tell you not to investigate
20 that claim or that that complaint -- that claim of
21 retaliation should not be investigated or was not
22 valid?

23 A. I am not aware of that.

24 Q. Did Dr. Battle at any point contact you
25 about any of these claims or did you contact Dr.

1 Battle?

2 A. I would not speak directly with Dr.
3 Battle, Dr. Battle would speak through my boss.

4 Q. Can you tell me any reason why Jane Doe's
5 complaint of retaliation was not investigated?

6 A. Can I think of any reason?

7 Q. Yes.

8 A. I don't know. I cannot -- unless it
9 wasn't for a protected class issue, but...

10 Q. Okay.

11 A. It doesn't mean it wasn't investigated, it
12 may not have been investigated by our office.

13 Q. Do you know of any other office at Metro
14 schools investigating Jane Doe's complaint of
15 retaliation?

16 A. I am not aware of...

17 Q. If someone brings a complaint of
18 retaliation like Jane Doe to your department and
19 it's not investigated properly, do you have a job
20 duty for counseling or disciplining Ms. Batey or
21 whoever else took in the complaint for not
22 investigating it?

23 A. It would be my responsibility to address
24 issues if they were identified in the process, yes.

25 Q. Have you, at any point, counseled with or

1 disciplined any employee in your office for not
2 properly investigating Jane Doe's complaint of
3 retaliation?

4 A. I have not.

5 MR. FOX: Objection to the form.

6 BY MS. STEINER:

7 Q. Do you know why Jane Doe's job as director
8 of school choice was eliminated in 2020?

9 A. I do not.

10 Q. Tell me a bit about if someone is
11 transferred to another position and their support
12 staff, are you aware about a 10 percent reduction in
13 salary being the limit?

14 A. I believe our procedures have something to
15 do with a 10 percent, but it's not something that I
16 am involved in frequently unless there is some type
17 of a wage grievance filed.

18 Q. Were you aware that Ms. Doe not only lost
19 her position as director of school choice, but when
20 she was transferred, she lost almost 40 percent of
21 her salary?

22 A. I was not aware of that.

23 Q. Were you aware that she filed a complaint
24 with your department claiming that she had lost over
25 40 percent and it should have been capped at

1 10 percent?

2 A. I don't remember that complaint being
3 filed, but, again, I believe Ms. Batey handled the
4 issues with Ms. Doe.

5 Q. If my client had complained about being
6 reduced -- if my client was considered -- if her
7 position was considered support and she's moved from
8 that position, do you know whether or not the
9 policies at Metro schools allow her -- limit the
10 reduction of her salary to 10 percent?

11 A. I think that that's inaccurate. I believe
12 it's 10 percent or the top of the pay grade,
13 whichever. You have to stay within the pay grades,
14 so depending on the position that person accepted or
15 was placed in, it would be 10 percent or the top of
16 the pay grade. I don't believe it's restricted to
17 10 percent, because if somebody dropped several pay
18 grades, it would be greater than 10 percent.

19 Q. And that's in the support handbook,
20 correct?

21 A. It could be in a procedural book.

22 Q. I'm going to try to pull that up the next
23 time we break, and if you could, too, if you could
24 try to pull it up, because we're going to see
25 whether or not it has this top of the pay grade on

1 that policy, okay?

2 If Ms. Doe -- if Jane Doe complained that
3 she was reduced more than 10 percent of her salary,
4 is that something that your department should
5 handle?

6 A. If it came to me as a level two grievance,
7 I would handle it, but I did not handle a level two
8 grievance on Ms. Doe.

9 Q. Where is the level one grievance filed?

10 A. It would be with the supervisor, the next
11 level supervisor.

12 Q. And for Ms. Doe, who was that?

13 A. I cannot tell you.

14 Q. If it is brought to your department, does
15 your department have a duty for telling the
16 employee, you need to take it back to the
17 supervisor?

18 A. We have. I don't know what was said to a
19 specific employee.

20 Q. Do you know whether or not your department
21 told Ms. Doe, hey, you need to take this complaint
22 about the 10 percent decrease in pay to your
23 supervisor?

24 A. I don't know.

25 Q. If this is taken to Bridget Jones, does

1 she have a job duty for telling Ms. Doe, you need to
2 take this complaint to your next level supervisor?

3 A. She is HR hiring manager, so they do
4 position movements and all that. Again, I don't
5 handle that piece, so I don't know what their
6 instruction is. I would think that they would help
7 them understand what the pay difference would be.

8 Q. Okay.

9 A. Again, that's me speculating. I don't
10 know for sure so...

11 Q. Do you know what happened to Ms. Doe's
12 complaint that she was not -- she was decreased more
13 than 10 percent?

14 A. No, I do not.

15 Q. Okay. Do you know whether or not her
16 longevity pay was reduced or cut out?

17 A. I do not.

18 Q. Did you know that Ms. Doe applied for
19 other positions at Metro schools?

20 A. I do not.

21 Q. Did you know that one of the supervisors
22 where she applied was informed -- one of the
23 individuals in HR was informed that they could not
24 hire Ms. Doe into a position because she had a
25 lawsuit against the district?

1 MR. FOX: Objection to the form.

2 THE WITNESS: I do not know that.

3 BY MS. STEINER:

4 Q. If an individual was informed of that,
5 someone in central office was informed, you cannot
6 hire Jane Doe because she has a lawsuit against the
7 district, does that employee have a job duty for
8 reporting it to your department?

9 A. I believe that they would probably discuss
10 it with their boss, and if it needed to come to us,
11 it would come to us.

12 Q. Okay. Do you mind if we break for about
13 five or ten minutes?

14 MR. FOX: That's fine.

15 (Brief break observed.)

16 BY MS. STEINER:

17 Q. We are going -- Ms. Harbison is going to
18 put a document up on the screen and it's the
19 promotions, demotions, transfers, reorganizations
20 and displacements policy.

21 MS. HARBISON: Can you see what's on my
22 screen?

23 THE WITNESS: Yes.

24 MS. HARBISON: Let me go to the first
25 page. This is what is being shown on the screen.

1 BY MS. STEINER:

2 Q. Is this the handbook?

3 A. That's the support handbook.

4 MR. FOX: What's the date?

5 THE WITNESS: That's an old support
6 handbook. That's not the most current.

7 BY MS. STEINER:

8 Q. Sure. Do you know if this is the one that
9 was in existence in the year 2020?

10 A. I can't remember the last time we updated
11 it. It was updated in 2020, but I'm not exactly
12 sure exactly when.

13 Q. If Ms. Doe were to testify this is the one
14 that she had that was in effect when she was
15 director of school choice, would you have any reason
16 to dispute that?

17 A. No. It all depends on the timing of when
18 it was, because the new handbook is now digital,
19 electronic, it's available on MyMNPS page, like each
20 one of us can access it at any time through that
21 page, so when it was updated, it was updated to an
22 electronic version. It all depends on the timing of
23 when that all transpired and when the book was
24 updated.

25 Q. Okay. We're going to take you to

1 Promotions. Do you see this that's entitled Job
2 Promotions, Demotions, Transfers, Reorganizations
3 and Displacements?

4 A. Yes.

5 Q. And is that the policy at Metro schools
6 for Promotions, demotions, and transfers for
7 support?

8 A. Yes.

9 Q. Okay. And for demotions, do you see where
10 it says demotion procedures, number (1) In the case
11 of a demotion resulting from poor performance or
12 employee choice, the employee's current salary shall
13 be reduced by 10 percent; and (2) In the case of a
14 demotion resulting from an organizational change or
15 development assignment, all attempts will be made to
16 keep the individual at the current salary; is that
17 correct?

18 A. That's what it says.

19 Q. Can you tell me -- when Ms. Doe made this
20 complaint that she had had a massive reduction in
21 salary, can you tell me what attempts were made by
22 Metro schools to keep her at her current salary?

23 A. I have no idea.

24 Q. Did anyone in your department question
25 anyone to find out what attempts were made to keep

1 her at her current salary?

2 A. If it was Ms. Batey, I would have thought
3 she would have conversed with the HR hiring manager
4 to see what had been done.

5 Q. If Ms. Doe was director of school choice,
6 can you tell me who her direct supervisor would have
7 been?

8 A. I have no idea.

9 Q. Do you know whether or not anyone from
10 Metro schools -- do you know why Ms. Doe was put in
11 a position that was at 40 percent lower than what
12 her salary was?

13 A. No, I do not.

14 Q. Would you agree that if you look at this
15 policy, if someone suffers a demotion because of an
16 organizational change or development assignment,
17 that in all likelihood, they're going to end up at
18 the same rate of pay, correct?

19 A. I don't make assumptions. I think it's on
20 a case-by-case. It says all attempts will be made
21 to keep them at their current salary.

22 Q. Now, assuming that the complaint -- Ms.
23 Doe takes a complaint to your department that she
24 suffered a demotion because of an organizational
25 change, and that she was put in a position that the

1 salary was almost 40 percent or over 40 percent
2 lower than what it had been before, would your
3 department have a duty for investigating that?

4 A. We'd have a duty for making sure somebody
5 looked into it from the compensation side.

6 Q. Do you know who would have been -- what
7 department you would have contacted for the
8 compensation side?

9 A. It would probably start with the HR hiring
10 manager, but it may go into the executive director
11 over employee services, because they were over
12 compensation.

13 Q. And who was that?

14 A. Well, at the time, it was the executive
15 director, and I think it was Lisa Spencer. Her
16 position is different now.

17 Q. Was Lisa Spencer recently promoted?

18 A. Yeah. Her title is different now.

19 Q. And that was a promotion, correct?

20 A. Yeah, I believe so.

21 Q. Okay. And if Ms. Doe makes a complaint to
22 your department that she was demoted due to an
23 organizational change due to the budget and your
24 department doesn't investigate that or doesn't send
25 it to the compensation side, should someone in your

1 department be disciplined or reprimanded or
2 counseled with that they didn't follow your policy?

3 A. We would address whatever we didn't do
4 that we should have done, but if it was shared with
5 somebody that was in a position to look into it, we
6 don't look into the wage pieces. Like I said, I
7 will look into wage pieces only if it comes to me as
8 a step two grievance, but I have to rely on other
9 people because I'm not intimately involved in the
10 whole wage complaint.

11 Q. Do you know whether or not anyone in your
12 department or the compensation department was ever
13 counseled with, disciplined or reprimanded for not
14 investigating Ms. Doe's complaint that she did not
15 receive the proper pay?

16 A. I do not know that anybody was addressed.

17 Q. Can you see how Jane Doe -- can you see
18 how Jane Doe, after she complains of the Let's Make
19 a Slave lesson taught to her son, within weeks has
20 her position as director of school choice,
21 eliminated, and then she is transferred into a
22 position where the pay cut is almost 40 percent, can
23 you see how she would think that's retaliation?

24 MR. FOX: Objection to the form.

25 THE WITNESS: I don't know all the

1 circumstances that surrounded all of that and the
2 timing when the decision was made to eliminate her
3 position. She is entitled to feel the way she wants
4 to feel or believe it's for reasons of her own
5 accord. It's hard enough for me to stay objective.
6 I don't always -- I try to empathize, but I don't
7 know what is on people's minds.

8 BY MS. STEINER:

9 Q. What did you do to empathize with Ms. Doe?

10 A. I didn't, because I didn't intimately get
11 involved with her situation.

12 Q. Now, in Ms. Doe's situation, do you know
13 who Gloria Hill or Angela Johnson -- do you know
14 either one of those two individuals?

15 A. Yes.

16 Q. Who are they?

17 A. Gloria Hill was a former HR manager, no
18 longer works with the district. Angela Johnson was
19 a former HR manager that handled central office
20 employees, and she is no longer with the district.

21 Q. As an HR manager, what do they do?

22 A. I can only speak generally. They handle a
23 lot of the hiring, opening up requisitions for new
24 positions who are assigned specific areas of the
25 school district. They took people from -- you know,

1 through the requisitions, through the hiring
2 process, did that, all the administrative
3 background, followed through the systems and brought
4 people on board. Then if there were transfers or
5 other status changes with employees, they would also
6 facilitate that.

7 Q. So then if an employee is applying for a
8 job at Metro schools and the department head wants
9 to hire them, do they have to get that approved by
10 the hiring manager?

11 A. They make the recommendations to the
12 hiring manager. I'm not exactly sure what the
13 approval process is, if it involves the executive
14 directors. Like I said, it's not something that I
15 interact with on a daily basis, but it's processed
16 through the HR hiring manager.

17 Q. Do you know why Ms. Johnson is no longer
18 with the district?

19 A. I understood that she resigned her
20 position.

21 Q. Do you know why she resigned?

22 A. I do not.

23 Q. Do you know why Gloria Hill is no longer
24 with the district?

25 A. Ms. Hill, I believe, accepted a position

1 where she could work remotely.

2 Q. Were you aware that -- I don't know if it
3 was Ms. Hill or Ms. Johnson, but I think it was Ms.
4 Johnson, were you aware that one of these
5 individuals was informed that they could not hire
6 Jane Doe into a position because of her lawsuit
7 against the district?

8 MR. FOX: Objection to the form.

9 THE WITNESS: I have no knowledge of that.
10 BY MS. STEINER:

11 Q. If that is known at Metro central office,
12 should it be brought to your attention?

13 A. It should have been brought to somebody's
14 attention. I don't know that it would have been
15 mine. I think it would go to the chief human
16 resource officer.

17 Q. If something like that was brought to your
18 attention, but the employee said, I don't want to
19 bring this to your attention because I fear
20 retaliation, what would you have done?

21 A. My response is that if you're telling me
22 something, I'm obligated to look into it and to see
23 if any wrongdoing has occurred and remedy it. I
24 cannot not do something with it.

25 Q. I want to talk to you a little bit about

1 this concept of fear and retaliation. If somebody
2 says, I have a fear of retaliation, it's my
3 understanding from your testimony today, that what
4 your office typically does is you tell them, well,
5 if you think you're retaliated against, come and
6 tell us?

7 MR. FOX: Objection to the form.

8 THE WITNESS: Yes. We ask them to file a
9 report.

10 BY MS. STEINER:

11 Q. After the retaliation happens, correct?

12 A. Well, it depends on when it comes. I
13 mean, if they're just expecting it or whatever, they
14 put it on the record. There is not anything to
15 investigate because something didn't happen yet.
16 Once it's happened, we can look into it.

17 Q. Okay. Now, when Dr. Bailey told you that
18 something's happened and I've been retaliated
19 against, he had already lost his position as
20 principal at White's Creek, correct?

21 A. Based on the timing of his complaint, yes.

22 Q. And did you have the ability to put him
23 back in his position at White's Creek?

24 A. I do not.

25 Q. So then if you wait until after the

1 retaliation occurs, the employees have been
2 retaliated against and you have no ability to
3 correct it, correct?

4 A. I think that if they substantiate that
5 retaliation occurred, then the recommendation would
6 be to remedy that situation.

7 Q. In Dr. Bailey's case, there was no
8 investigation so there was no recommendation,
9 correct?

10 MR. FOX: Objection to the form.

11 THE WITNESS: I don't know that there was
12 no investigation.

13 BY MS. STEINER:

14 Q. If someone says they have a fear of
15 retaliation, do you separate the individuals, or do
16 you have to have actual retaliation occur?

17 A. We have to assess whether or not -- what
18 the risk is.

19 Q. Did you ever assess the risk of
20 retaliation when Dr. Bailey complained to Ms. Batey
21 about retaliation?

22 A. I don't know when he reported it to
23 Ms. Batey, so I only know of what he sent me.

24 Q. Assuming that he reported to Ms. Batey
25 that he had a fear of retaliation in April, before

1 he lost his job, April of 2020, do you know what the
2 assessment of retaliation was at that point?

3 MR. FOX: Objection to the form.

4 THE WITNESS: I do not.

5 BY MS. STEINER:

6 Q. Do you know what -- how do you calculate
7 an assessment of retaliation?

8 A. You assess the risk to the individual,
9 interaction, et cetera, et cetera. Like I said,
10 everything is on a case-by-case situation. We try
11 to evaluate and try to put safeguards in place, but,
12 again, we are a small department and we rely upon
13 the assistance from the relevant leaders.

14 Q. Okay. Dr. Bailey, when he complained of
15 retaliation, he had a fear of retaliation in, I
16 believe it was April of 2020, before he lost his
17 job, how would you assess the risk involved in that?

18 A. I don't know.

19 Q. Do you know whether or not the risk of
20 retaliation was ever assessed by your department?

21 A. I don't know. But if it was April of
22 2020, the end of the school year was in May of 2020,
23 I would think that the timing of that would have --
24 I believe the notification to those being impacted
25 by nonrenewals is usually a month out from the end

1 of the year, so it may have already been something
2 that he was aware of when he brought it to Ms. Batey
3 if it was in April, depending on when he was
4 notified by a supervisor.

5 Q. Okay. What was my question?

6 (Requested portion of record read.)

7 THE WITNESS: I don't know.

8 BY MS. STEINER:

9 Q. Now, as you sit here today, do you have
10 any plans of going back to your department to find
11 out whether or not the risk was ever assessed and
12 counseling or reprimanding any employees for not
13 assessing that risk?

14 MR. FOX: Objection to the form.

15 THE WITNESS: I would be concerned whether
16 or not I would be doing something that would
17 obstruct your case at this point.

18 BY MS. STEINER:

19 Q. And so do you mean something that would
20 either support or not support Metro schools'
21 position in this matter?

22 A. No, that's not what I meant.

23 Q. What do you mean?

24 A. I mean, if you're deposing somebody else
25 in my department, I don't want to interfere with

1 that situation, because all the information related
2 to this situation would be in that person's office.
3 And if I were to investigate it, I would have
4 to involve that individual.

5 Q. And why can't you do that if I'm going to
6 take their deposition?

7 A. I don't know. I don't want to interfere.
8 I would want -- not want to interfere.

9 Q. So you would not do anything?

10 A. No, that's not what I said.

11 Q. Will you do something?

12 A. Eventually, yes.

13 Q. What will you do?

14 A. I don't know. Depends on what I find.

15 MR. FOX: Objection to the form.

16 BY MS. STEINER:

17 Q. Okay. When you're investigating
18 complaints of retaliation, do you look at things
19 like termination notices, letters?

20 A. We would look at whatever documentation
21 was available surrounding the situation.

22 Q. Did you know -- if the director of schools
23 says they nonrenewed someone for job performance, is
24 that decision by the director set in stone, meaning
25 nobody else is going to come in and alter that and

1 say, no, you can't do that?

2 A. Ultimately, it's the director of schools'
3 decision, but prior to those recommendations for
4 nonrenewals being presented, I am aware that there
5 is a process to ensure that there's adequate
6 documentation to support a nonrenewal for
7 performance.

8 Q. Okay. And when you say adequate
9 documentation, what do you mean?

10 A. That they have taken progressive steps to
11 either support the employee and success in their
12 role or they've initiated the corrective action
13 process.

14 Q. If there's no documentation to support the
15 removal of Dr. Bailey as principal, would your
16 department tell whoever wants to remove him, you
17 can't do this because there's no documentation?

18 A. It's not my place. My department doesn't
19 evaluate the nonrenewals. We're not involved. We
20 just find out who it has been so...

21 Q. It it's for job performance, does your
22 department have the ability to go in and say, you
23 need to document problems with job performance
24 before you can nonrenew for job performance?

25 A. We encourage our leaders to document

1 performance issues.

2 Q. Do you know whether or not Dr. Bailey had
3 any performance issues documented with him?

4 A. I do not know that.

5 Q. Let me hand you this real quick. And I'm
6 going to get another copy for the court reporter
7 because this has something on the back that I do
8 not -- it's not necessary to make an exhibit here.

9 If you could read this May 4, 2020 letter,
10 then I'll question you just a bit about it.

11 MS. STEINER: I would like to make the --
12 what we've got on the board right now, the Support
13 Handbook, the first page and then the page that we
14 discussed dealing with promotions and demotions, so
15 it's going to be two pages, the next-numbered
16 exhibit and I think it's Exhibit 3.

17 (WHEREUPON, the
18 previously-mentioned document was
19 marked as Exhibit Number 3.)

20 BY MS. STEINER:

21 Q. Now, Ms. Zander, have you ever seen this
22 before?

23 A. Have I ever seen this particular letter
24 before?

25 Q. Yes.

1 A. No.

2 Q. Is this addressed to Dr. Bailey?

3 A. It appears to be.

4 Q. Does this state that Dr. Bailey has lost
5 his position due to the district's organization and
6 budget impact?

7 A. That's what it says.

8 Q. Does that mean because the job has been
9 eliminated; is that what that means?

10 A. I don't know that the job was eliminated.

11 Q. Will you agree this does not say for job
12 performance?

13 A. It does not say that it was for job
14 performance.

15 Q. And if someone has their position
16 eliminated for job performance, should the
17 supervisor be honest with them and tell them that's
18 why their position is being eliminated?

19 A. In a perfect world, yes.

20 Q. Okay. Do you know today why Dr. Bailey
21 lost his job as principal at White's Creek?

22 A. I understand that there were school
23 statistics and school data information that
24 continued to decline under his leadership, and --
25 which is what prompted the change, but specifically,

1 I do not know.

2 Q. And who told you that?

3 A. I think it's just an understanding that
4 was shared. I don't know if it was by Dr. Griffin
5 or whether it was because I was collecting
6 information related to a public records request that
7 I learned of it. I can't tell you where I came to
8 know that or learned of that.

9 Q. Can you tell me what documents you looked
10 at?

11 A. No, I can't tell you.

12 Q. Now, do you know where -- do you know --
13 it's my understanding Dr. Griffin has left the
14 district; is that correct?

15 A. Yes, I believe she retired.

16 Q. Do you know if she has any health issues?

17 A. I wouldn't be at liberty to discuss those
18 if I did.

19 Q. Do you know if she has any health issues?

20 MR. FOX: You can tell her, if you know.

21 THE WITNESS: I don't know, if she has
22 health issues, what they are. I believe it was due
23 to her health.

24 BY MS. STEINER:

25 Q. Do you have -- so you have no idea whether

1 or not she may have cancer or if she may have had a
2 heart attack or something else may have been going
3 on with her?

4 A. I have no idea what the health issues are.

5 Q. And so it was only after you got a record
6 request that you looked into why Dr. Bailey was no
7 longer there?

8 A. I don't know that I actively researched
9 it. I don't know exactly when I became aware of --
10 it could have been interaction with Dr. Mells. I
11 can't specifically say when I became aware of
12 possible reasons for the change.

13 Q. Do you tell the people who work -- do you
14 tell the staff at MNPS that they need to keep their
15 documentation of things?

16 A. That would be my guidance, to maintain
17 documentation.

18 Q. If documents are missing, what do you do,
19 do you do an investigation to find out why?

20 A. It depends on if it's something that would
21 come into our realm of responsibility, but people
22 don't preserve documents -- I mean, like I said,
23 there is three investigators in my office, I don't
24 know that we have the resources to investigate
25 missing documentation throughout a district the size

1 we are.

2 Q. Did you know that the executive directors
3 were told they were going to have to reapply for
4 their positions?

5 A. I am aware of that, yes.

6 Q. Did you know that the scores -- that the
7 applicants were scored, did you know that?

8 A. Did I what?

9 Q. Know that the applicants were interviewed
10 and scored?

11 A. I wasn't part of that process, so -- but
12 interviews, they do score on a scale. Each person
13 on the panel scores on a scale and then they put it
14 all together and come up with the highest scoring or
15 whatever, but I don't know, I didn't partake in that
16 process.

17 Q. Is it the procedure of Metro schools that
18 when the interviews occur, that you should have the
19 same interviewers and interview the person at the
20 same time?

21 A. When possible.

22 Q. Okay. Because if you have different
23 interviewers, you could have people who score
24 differently affecting the score, correct?

25 A. Yes.

1 Q. Okay. So then is it the procedure at
2 Metro schools, and the procedure that I assume your
3 department tells Metro schools, if you interview,
4 make sure you use the same interviewers and have
5 them interview the candidate at the same time so
6 they can hear the same questions?

7 A. Again, this is not a process I oversee. I
8 am guided by somebody to -- when I hired, and I only
9 hired one individual in the time I've been with the
10 district, I know that I want a consistent panel. I
11 want the same parties to be available for all the
12 interviews that I'm going to conduct so that I don't
13 run into trouble with inconsistencies with scoring.

14 Q. Would it be inconsistent if you used
15 different interviewers?

16 A. It's possible that it's inconsistent with
17 different interviewers.

18 Q. Did you know that for the executive
19 director's position, that some of the scores were
20 missing?

21 A. No, I did not.

22 Q. Okay. Did you know that after the
23 interviews were supposed to be concluded, that
24 individuals were told they did not have the job and
25 that interviews continued thereafter with Brian

1 Mells; did you know that?

2 A. No.

3 Q. Did you know Brian Mells' scores ended up
4 missing?

5 A. I would not know that information.

6 Q. Excuse me, I made a mistake.

7 MR. FOX: Objection to the form.

8 BY MS. STEINER:

9 Q. Chad High. Did you know Chad High's
10 scores ended up missing?

11 A. I would not know that information.

12 Q. Did you know that Chad High was hired as
13 an executive director and his scores were missing?

14 A. I know that Chad High is an executive
15 director, I have no idea about the other part of
16 your question. I would not have knowledge of any of
17 that.

18 Q. If there is a claim of retaliation by, for
19 instance, Pippa Meriwether, Lily Leffler, Dr. Damon
20 Cathey, and anyone else that may have interviewed
21 for that executive director's position, if there is
22 a claim that they were retaliated against, should
23 that have been brought to the attention of your
24 department?

25 A. If the retaliation claim was against

1 someone like the chief HR, again that would have
2 been farmed out to a different investigator.

3 Q. Do you know whether or not any of these
4 complaints of retaliation that Dr. Meriwether, Dr.
5 Leffler, Dr. Cathey, Dr. -- made with regard to the
6 executive director positions, do you know whether or
7 not they were ever investigated?

8 MR. FOX: Objection to the form.

9 THE WITNESS: The only complaint I saw
10 from those three individuals you're naming
11 specifically was a complaint that was addressed to
12 me by Dr. Meriwether. It was not a complaint of
13 discrimination. It was more a complaint of
14 inconsistency with the processes around the
15 selection process.

16 BY MS. STEINER:

17 Q. So her letter to you did not mention
18 retaliation or discrimination?

19 A. I don't recall it saying it anything
20 having to do with retaliation or discrimination.
21 She even said, this doesn't have to be looked into,
22 I just didn't want other people subjected to this.

23 Q. If she had claimed retaliation, would your
24 department have assigned it to someone to
25 investigate it?

1 A. It would have gone outside the
2 organization.

3 Q. Did her complaint of retaliation go
4 outside the organization?

5 A. I did not outsource a complaint from Dr.
6 Meriwether to another investigator outside. If she
7 filed an EEOC charge, that would be handled
8 differently through our legal department.

9 Q. Can you tell me why you did not outsource
10 Dr. Meriwether's claim of -- that she brought to
11 you?

12 A. I didn't consider it a claim of
13 discrimination or harassment. She was talking about
14 the processes and the individuals.

15 Q. Okay.

16 A. It's my understanding, there was a
17 response given to her.

18 Q. What did the response --

19 A. Even though she did not ask for a response
20 or an investigation. I don't know. Dr. Barnes sent
21 the response.

22 Q. If someone asked you not to investigate do
23 you still have a duty to investigate once it's
24 brought to your attention?

25 A. If the employee says, I don't want you to

1 do anything about it because, I still have a duty to
2 investigate it.

3 Q. Okay.

4 A. Which is why that was raised. I shared
5 that information with my boss at the time.

6 Q. Who was your boss at the time?

7 A. Mr. Barnes or Dr. Barnes.

8 Q. So you shared Dr. Meriwether's complaint
9 that she brought to you with to Dr. Barnes?

10 A. I did.

11 Q. And why -- when you shared it with him,
12 did you ask him what you should do?

13 A. I may have. I don't remember exactly what
14 we discussed.

15 Q. Do you know what he told you?

16 A. No.

17 Q. Do you know what Metro schools did as a
18 result of Dr. Meriwether's complaint?

19 A. Like I said, I was aware that there was a
20 response from Dr. Barnes, other than that, I do not
21 know.

22 Q. You were aware there was a response from
23 Dr. Barnes?

24 A. Yes.

25 Q. But you don't know what was in that

1 response?

2 A. I can't remember it.

3 Q. Was it by e-mail, was it oral?

4 A. I believe there was a letter.

5 Q. A letter from Dr. Barnes to you about what

6 --

7 A. To Dr. Meriwether. No.

8 Q. From Dr. Barnes to Dr. Meriwether?

9 A. Yes.

10 Q. And do you know what it said?

11 A. I don't remember exactly what it said. It
12 was responding to some of the things that she had
13 raised in her concern.

14 Q. And did Dr. Barnes investigate it?

15 A. I don't know what Dr. Barnes did.

16 Q. Okay. Let me hand you this that's dated
17 June 21st, 2020, do you recognize this document?
18 (Court reporter asks for clarification.)

19 MS. STEINER: I'd like to offer as an
20 Exhibit 4, Dr. Bailey's termination -- or the May
21 4th, 2020 letter to Dr. Bailey.

22 (WHEREUPON, the
23 previously-mentioned document was
24 marked as Exhibit Number 4.)

25 MR. FOX: No objection.

1 THE WITNESS: I've never seen this before.

2 MS. STEINER: Let's have that marked the
3 next-numbered exhibit for identification purposes.

4 (WHEREUPON, the
5 previously-mentioned document was
6 marked for identification as
7 Exhibit Number 5.)

8 BY MS. STEINER:

9 Q. Were you aware that in 2018 that there was
10 a complaint of retaliation, fear of retaliation, or
11 retaliation that was brought to your department by
12 Dr. Meriwether and on behalf of Dr. Bailey?

13 A. In 2018?

14 MS. STEINER: Yes.

15 MR. FOX: Objection to the form.

16 THE WITNESS: I don't know of anything
17 like that.

18 BY MS. STEINER:

19 Q. Were you aware that a complaint was -- a
20 complaint that there was a fear of retaliation was
21 brought to your department by Dr. Meriwether or by
22 anyone else on behalf of Dr. Bailey because he
23 feared retaliation because of having to deal with
24 the Coach Battle situation?

25 MR. FOX: Objection to the form.

1 THE WITNESS: Again, I wasn't involved in
2 the Coach Battle situation, so I don't know that I
3 knew that.

4 BY MS. STEINER:

5 Q. In August of 2018, you were already at
6 Metro schools, correct?

7 A. Yes.

8 Q. Were you the director of employee
9 relations then?

10 A. Yes.

11 Q. Did you know then that as the
12 administrative hearing was being conducted about
13 Coach Battle and whether or not he kept his job or
14 didn't keep his job, did you know that Dr. Bailey
15 was in fear for his job and actually in fear for his
16 safety?

17 A. No, I did not know that.

18 Q. Should that have been brought to your
19 attention when you came in as the director of
20 employee relations?

21 A. I don't -- (Court reporter asks for
22 clarification) I don't know.

23 Q. Do you have any job duty for investigating
24 complaints of retaliation or discrimination filed
25 with the EEOC?

1 A. Those are handled through Metro legal.

2 Q. Okay.

3 A. And they work closely with Mr. Young.

4 Q. Do you know what the term "protected
5 activity" means?

6 A. Yes.

7 Q. Okay. And do you understand that that
8 means you cannot be retaliated against for engaging
9 in a complaint of discrimination, retaliation or
10 whistleblower activity?

11 MR. FOX: Objection to the form.

12 THE WITNESS: Do I know that that's what
13 it means?

14 BY MS. STEINER:

15 Q. Yes.

16 A. I know that that's part of the definition.

17 Q. In the school year, from the time you got
18 there, say August or would it have been July of 2018
19 through the end of the 2020 school year, can you
20 tell me any school principals who engaged in any
21 activity you would have considered protected?

22 A. I don't know. I don't know. I mean,
23 principals make recommendations to us for actions
24 against employees. Principals have the right to raise
25 concerns. But I don't recall.

1 Q. Meaning do you know of any principal who
2 said there's discrimination or retaliation going on
3 at Metro schools from the date you got there through
4 the end of the 2020 school year?

5 A. The ones that came into our department to
6 investigate, but if you're asking me to list them, I
7 can't list them.

8 Q. Who came in your department to
9 investigate?

10 A. No, if they came in to our department to
11 file a complaint, we would look into them and
12 investigate.

13 Q. Can you tell me the names of anyone who
14 came into your department who was a principal, from
15 the time you got there until the end of the 2020
16 school year to file a complaint?

17 A. The only one I can recall I believe is the
18 Pippa Meriwether, but I can't recall if there were
19 others.

20 Q. Do you recall any assistant principals
21 making any complaint of discrimination from the time
22 you got there until the end of the 2020 school year?

23 A. Yes.

24 Q. Who?

25 A. It was somebody that was filing a

1 complaint against Dr. Sharon Braden, but I can't
2 remember the name of the individual.

3 Q. Okay. Other than that, can you think of
4 anyone else?

5 A. Not off the top of my head.

6 Q. Okay. Now, can you think of anyone from
7 the end of the 2020 school year, the spring 2020
8 school year through today's date that was either a
9 principal or assistant principal who filed a
10 complaint of discrimination or retaliation against
11 Metro schools?

12 A. Nothing is -- I can't recall.

13 Q. Do you know of any principal whose
14 contract has been nonrenewed by Metro schools since
15 you've been there, other than Dr. Bailey?

16 A. No, but that doesn't mean it hasn't
17 occurred.

18 Q. Okay. If there is an atmosphere of fear
19 of retaliation at Metro schools, should that be --
20 should that be brought to your attention?

21 A. I would say depending on the type of fear
22 of retaliation, for what purpose, yes.

23 Q. Did you know that in the prior
24 administration at Metro schools, for instance,
25 Dr. Joseph, did you know that there was an actual

1 fear of retaliation if someone should make a
2 complaint of retaliation?

3 MR. FOX: Objection to the form. 2.

4 THE WITNESS: So you're asking if I had
5 knowledge of?

6 BY MS. STEINER:

7 Q. Yes.

8 A. You know, knowledge of factual
9 information, no. Knowledge of scuttlebutt,
10 knowledge of people saying things, I mean, I'm
11 always an advocate that I would ensure that I did
12 what I could to protect the confidentiality of all
13 parties. I would give them notice that if
14 retaliation occurred to please let me know and that
15 I would make sure that we would address it and
16 correct the situation. You know, I would like to
17 think that we support the school system to foster an
18 environment that's not -- that's free of all forms
19 of harassment, discrimination, retaliation, but like
20 I said, we are a small group of people, we focus on
21 protected class issues. I don't know that all of
22 those situations make it to us.

23 Q. Okay. When you say, "scuttlebutt," was
24 there common knowledge around central office -- and
25 I assume you're in central office, correct?

1 A. It's called the support hub now, yes.

2 Q. And when you're in the support hub or
3 central office, was it common knowledge around there
4 that there was a fear of retaliation if you report
5 something?

6 A. I don't know that common knowledge is an
7 adequate term.

8 Q. Was there knowledge that if you report
9 something, you will be retaliated against?

10 A. So there is rumors, there's speculation, I
11 don't know if what I was hearing was factual,
12 truthful or if it was speculative or rumors.

13 Q. But you did hear rumors that there was a
14 fear of retaliation, correct?

15 A. What I would base my opinion on was if
16 people came to me and said they feared retaliation.

17 Q. You heard that there were rumors of
18 retaliation, correct?

19 A. I heard that people felt there were people
20 that were untouchable, but I didn't witness or
21 experience any of that.

22 Q. Did you hear that there was a fear by some
23 of the workers that there was retaliation, if you
24 said something, you would be retaliated against?

25 A. I did not know that to be a fact.

1 Q. Did you hear that? I'm not asking you if
2 you knew it to be a fact. I'm asking you under
3 oath, did you hear that there was a fear of
4 retaliation if somebody complained of discrimination
5 or hostile work environment?

6 A. I don't know. Like I said, if I heard
7 something, it would be from somebody I was
8 interacting with in an investigation.

9 Q. Did you hear, did you hear from anybody,
10 any statement that implied to you that there was
11 fear of retaliation at Metro schools?

12 A. Like I said, I heard, but I didn't know
13 whether it was rumor.

14 Q. Okay. So you did hear that there was --

15 A. Right.

16 Q. Is that correct?

17 A. It's possible that I heard it in the
18 course of an investigation.

19 Q. You did hear that there was a fear of
20 retaliation at Metro schools, correct? Yes or no?

21 A. You're putting words into my mouth. I
22 think I'm telling you that if somebody came to me
23 during the course of the investigation I was
24 involved in and they feared retaliation, I would
25 understand and note that. I heard that frequently

1 when I interviewed people. Did I hear it generally
2 or speculatively? I don't listen to that stuff, so
3 I can't tell you whether or not I heard it from
4 that.

5 Q. Okay. I don't care if you don't listen to
6 it, my issue is this. Can you tell me today under
7 oath, and it sounds like you did, it sounds like you
8 heard scuttlebutt out there that if you complained
9 of retaliation or discrimination, you will be
10 retaliated against at Metro schools?

11 A. I think that there were people that feared
12 retaliation, but don't ask me where I heard it from.

13 Q. Did you know that the administration --
14 who was in charge of Metro schools when you came in
15 there?

16 A. Dr. Shawn Joseph.

17 Q. Did you know that Dr. Joseph recognized
18 this fear and was trying to correct it?

19 A. No, I did not.

20 MR. FOX: Objection to the form.

21 BY MS. STEINER:

22 Q. Did you hear any statements from anyone at
23 Metro schools that there is a fear by our workers
24 that they will be retaliated against and we need to
25 stop this?

1 A. I don't remember hearing that.

2 Q. Do you know of Metro schools, at any point
3 in time, doing anything to assure its workers that
4 they would not be retaliated against?

5 A. Other than us saying that to them when
6 they came to us with their concerns, having it in
7 policy, having board policies that, you know, we try
8 to foster environment free of all forms of
9 harassment, discrimination and retaliation, other
10 than that, I know that different departments have
11 done cultural assessments to try to understand the
12 concerns of the employees, but I don't know anything
13 specifically to address that because it's very
14 broad.

15 Q. Do you think it's a good environment for
16 an organization for its employee to have a fear of
17 retaliation?

18 A. Do I believe it's a healthy environment
19 for --

20 Q. Yes.

21 A. -- employees? I don't think it's a
22 healthy environment for one employee to fear
23 retaliation, but that's -- I can't make the general
24 assessment for the entire district.

25 Q. When Metro schools went through the

1 reorganization in 2020, did you realize that a high
2 percentage of the employees who were affected had
3 engaged in protective activity?

4 MR. FOX: Objection to the form.

5 THE WITNESS: No. I would not know that.

6 BY MS. STEINER:

7 Q. Did you know that a statistician hired in
8 this matter said that it was very, very high
9 probability that protected activity entered into the
10 decision just because of the statistics?

11 MR. FOX: Objection to the form.

12 THE WITNESS: I did not know that. I did
13 not know that there was a statistician.

14 MS. STEINER: Okay. I think that is it.

15 MS. HARBISON: I just have a couple of
16 questions.

17 MR. FOX: Two questions?

18 EXAMINATION BY MS. HARBISON:

19 Q. Ms. Zander, remind me of your new last
20 name.

21 A. Munoz.

22 Q. Munoz. Congratulations. I represent Dr.
23 Damon Cathey in this case, so there's five
24 plaintiffs in this case, okay, and I represent Dr.
25 Cathey.

1 My name is Jesse Harbison.

2 At the very beginning of your deposition,
3 you said that in your interview that you were
4 apprised or told that there were some things that
5 were ongoing in the district; is that correct?

6 MR. FOX: Objection to the form.

7 THE WITNESS: I don't know if it was in
8 the interview process or in, you know, when I was --
9 before I got here, but it was very general, mostly,
10 nothing specific.

11 BY MS. HARBISON:

12 Q. What do you remember being told?

13 A. I don't remember what I was told. I just
14 remember that when I got here, what was told to me
15 didn't adequately prepare me for what I encountered.

16 Q. Tell me what you encountered.

17 A. It was just -- there was a lot of stuff
18 going on in the district at the time. There were
19 issues raised about principals, there was a lot of
20 press involvement. It was just a very hectic time
21 and for me to be trying to learn my job while
22 dealing with a hectic environment was just very
23 stressful.

24 Q. What caused the hectic environment, what
25 are you specifically talking about?

1 A. I think the fact that there was transition
2 in my department. There was me and one other person
3 and we were responsible for investigating
4 harassment, discrimination issues throughout the
5 district. At the time, it was just me and one other
6 person. We had an assistant. Mr. Young was there,
7 as well, but basically it was two investigators.
8 And like I said, I learned under fire. You know,
9 you just get inundated and you learned as you went.

10 I came in with knowledge of
11 investigations, I came in with experience of
12 employee relations and different facets of employee
13 relations, but not what was -- just -- I didn't -- I
14 was not familiar with the school district and the
15 publicness of everything in a school district. So
16 that was just something I had to acclimate to.

17 Q. Okay. Let's unpack that a little bit.
18 You had two investigators when you started with
19 Metro, did you include you?

20 A. Yes.

21 Q. And there's three now?

22 A. Correct.

23 Q. Does that include you?

24 A. Yes.

25 Q. Do you have the resources that you need to

1 be able to adequately do your job?

2 A. I would say it's feast or famine for us.
3 We either get a high level of incidents and we're
4 dealing with multiple cases, or there aren't a lot
5 of issues. It ebbs and flows.

6 At times, it seems overwhelming, an
7 overload, but we've gotten additional resources
8 since I've been there, so I'm grateful for that, and
9 that's why we try to restrict it to just protected
10 class issues, because -- and help, enable or
11 basically empower the leaders to work through other
12 employee issues; although, we help and guide and
13 talk through different scenarios with leaders.

14 Q. Let me tell you why I'm asking this
15 question. Seems to me, I'm on the outside, right,
16 that three investigators for 12,000-plus employees,
17 possibly is not enough investigators for y'all to
18 feel like you can actually investigate every claim
19 that comes to you; is that accurate?

20 A. Like I said, if we restrict it to just the
21 protected class issues, we're in a better place.
22 Does it mean that at times there's multiple things
23 going on at the same time? Yes. But now we also
24 have the Title IV division, and there are multiple
25 investigators there, and so we have additional

1 resources with that group, but that's just recently
2 formed.

3 Q. Who made the decision to restrict your
4 investigations to issues regarding protected
5 classes?

6 A. I have no idea, it was that way when I got
7 there.

8 Q. What is your understanding about what
9 protected classes are?

10 A. Anything that's in violation of Title VI,
11 Title VII, Title IV, you know, and then our policies
12 are actually a lot more -- anything having to do
13 with race, ethnicity, sex, sexual harassment,
14 harassment, based on any of those protected classes,
15 ADA, religious. I mean, the list goes on. Sexual
16 orientation, gender identity, et cetera. There's a
17 multitude of protected classes.

18 Q. You may have answered this already, so
19 forgive me if you have. But if someone comes to you
20 and they've got an issue and it doesn't relate to a
21 protected class, where do you send them?

22 A. I review the concern. I may interview
23 them to find out what the basis is of the complaint,
24 and then I would work with the leadership, whether
25 it's the principal at a school, the leader over the

1 principal of the school or the leader of the
2 department where the incident is occurring to make
3 sure that the issue is reviewed and resolved.

4 Q. Okay. I want to go back to something that
5 you said when I first asked you a question, which
6 was, there was a lot going on, it was very hectic
7 when you first started, there was only two
8 investigators, which isn't very many. What
9 specifically can you remember, as far as specific
10 situations, that were happening when you first
11 started at MNPS, meaning do you specifically recall
12 that there was an investigation about a person whose
13 name you can remember, and, if so, do you remember
14 what their name is? Like tell me specifically what
15 was happening that made it hectic.

16 A. I think the stuff going on with Mr. Sam
17 Braden. I believe that was -- I think the -- a lot
18 of things happening with the press, public records
19 requests that came into our department as well, we
20 had to respond to those things. It was a very
21 tumultuous few months, so to be honest with you, I
22 can't recall everything that was going on in that
23 timeframe. But it just seemed like a lot that I had
24 not encountered in my prior HR career.

25 Q. Do you remember the Sam Braden issue, do

1 you remember anything else specifically that was
2 going on during that time that made it hectic?

3 A. Well, like I said, every time they did a
4 public records request and somebody's information
5 got shared, that would come to us, too. People
6 would be upset that their information was out there.
7 You know, we say we try to keep it confidential but
8 we also say that we do the best we can, but we can't
9 always guarantee it.

10 So working in a public environment, like I
11 said, that was a transition for me. I've not worked
12 in a public environment before.

13 Q. Does your office handle public records
14 requests?

15 A. The -- we get requests for investigative
16 information or personnel files. My admin will
17 respond to personnel file or investigative file,
18 stuff that we have.

19 Q. Who asks you for those, is it someone
20 within the district?

21 A. Yeah, the communications department field
22 all public records requests.

23 Q. Has anyone ever told you that it's a
24 concern when a matter becomes fodder for the press?

25 A. I am concerned when a matter becomes

1 fodder for the press, because in my heart and
2 instinctually, you want to protect the people that
3 have filed complaints or concerns, but, yet, in some
4 regards, we don't have the ability to protect
5 anyone, the public has access to all that kind of
6 stuff.

7 Q. If someone came to you -- well, let me ask
8 it this way. If an employee came to you or
9 something in your office and said that they feared
10 they were being retaliated against or thought they
11 were being retaliated against because they refused
12 to remain silent about something that was happening
13 that was illegal, and the illegal activity didn't
14 have to do with a protected class, okay, would that
15 be something that your office would investigate?

16 A. You have to give me an example.

17 Q. Okay. Someone is falsifying student
18 grades, someone is refusing to remain silent about a
19 principal's falsification of grades and they fear
20 they're being retaliated against or think they're
21 being retaliated against, who would investigate
22 that?

23 A. That would be somebody -- you know, I
24 would probably bring somebody in over -- actually, I
25 did get involved in a situation with Dr. Cathey

1 regarding -- you know, it had to do with the online
2 training system that they had for students, so Dr.
3 Cathey and I worked together at a school to try to
4 get to the bottom and resolve the issues, who was at
5 fault, who -- you know, if the grades were falsified
6 or if the grades were inaccurately inflated or
7 deflated, and it was really -- it was something that
8 was out of my realm. I did assist him in that type
9 of situation, but normally grades are handled at the
10 executive director level or -- he was a community
11 superintendent I think at the time, and we
12 definitely would involve the testing group that
13 oversees the testing. That's not my area of
14 expertise.

15 Q. Okay. But is there a policy that if
16 someone comes to you and complains about something
17 that's illegal but it's not related to protected
18 activity and they're scared they're going to be
19 retaliated against or have been retaliated against
20 because they're refusing to remain silent about
21 something that's illegal, is there a policy written
22 anywhere saying that you'll refer that person to
23 someone else because that's outside of your
24 department?

25 A. I usually have to collaborate. Those

1 aren't frequent occurrences. I would collaborate
2 with my boss and say, how do we handle this.
3 Because any claim that comes in or somebody has any
4 kind of fear, and, of course, anything that
5 compromises somebody's integrity or unlawful
6 behavior, you know, that's of concern to me. I
7 don't want to represent an organization that stands
8 for that.

9 So I would do what I could to support it.
10 I don't know who I would -- it depends on what it
11 is, testing -- you know, if a principal is doing it,
12 then we bring it to the executive director to look
13 into.

14 Q. The grade falsification, I'm going to
15 share my screen with you, was the grade
16 falsification that you were describing at Stratford
17 High School?

18 A. Yes.

19 Q. And did it involve Dr. Michael Steel?

20 A. Yes.

21 Q. Okay. Can you see my screen right now?

22 A. Yes.

23 Q. This says Investigative Summary Form at
24 the top, correct?

25 A. Yes.

1 Q. And it also says at the top right corner,
2 Submitted by Mary Ellen Zander, which was your
3 previous name, correct?

4 A. Yes.

5 Q. Does this look familiar to you, this
6 investigative summary form?

7 A. Yes.

8 Q. Did you draft this document?

9 A. I did.

10 Q. How did you get pulled into this
11 particular case, or this particular issue, rather,
12 because it seems a little outside your normal --

13 A. I think it was -- I don't know how I got
14 pulled into it. I don't know if I was directed to
15 support it. I don't know if Dr. Cathey asked for
16 help and I assisted, because it was a pretty complex
17 situation. I don't know how I got pulled into it, I
18 just ended up being pulled into it.

19 Q. Sure. This form, is this something that's
20 used in all investigations, this investigative
21 summary form?

22 A. It was a template that was created by my
23 former boss that was utilized, but now we don't
24 utilize this form.

25 Q. Why not?

1 A. Because it was hard to follow, sometimes
2 it was more information than was necessary, so we
3 kind of tried to streamline our process and it's
4 more of a fact-finding summary. It's hopefully
5 fewer pages than eight.

6 Q. Did you conduct the actual investigation
7 into the allegations of grade falsification by
8 Michael Steele?

9 A. I interviewed individuals with Dr. Cathey.
10 We both interviewed people together. I think he led
11 them, I might have taken the notes.

12 Q. At the top where it says, submitted by,
13 who did you submit this to?

14 A. It would have been -- well, Dr. Cathey was
15 part of the investigation, but the recommendations
16 and everything would have gone to leadership over
17 Dr. Cathey, I think, or my boss.

18 Q. Do you recall who that was at that time?

19 A. No.

20 Q. Okay. I'm going to scroll down and show
21 you past the timeline.

22 A. Yeah, that's my favorite part.

23 Q. Are you -- sometimes it doesn't read on
24 the record, are you being sarcastic when you --

25 A. Yes, I am.

1 Q. I'm in control of the -- there you go.
2 When you say it's my favorite part, is it just
3 because it's long?

4 A. Yes. And detailed, and you're trying to
5 put things into perspective, like when things
6 occurred.

7 Q. But you're making a joke?

8 A. I was, I was.

9 Q. So we've got a court reporter here and so
10 sometimes it's hard to tell.

11 Do you recall that the outcome of this
12 investigation was that Dr. Steele had a contract
13 with students that they would get certain grades
14 based on their effort as opposed to the actual
15 mastering of material?

16 A. I recall something about something that
17 was signed. I don't know that it definitively
18 substantiated Dr. Steele's direction to that nature.
19 I think it might have been one of the assistant
20 principals that was trying to organize something or
21 put things into some kind of sense or -- I don't
22 know if it led directly back to Dr. Steele or if it
23 led to an assistant principal.

24 Q. Well, let me show you something on here.
25 Can you read this paragraph that I have highlighted

1 just to yourself and let me know when you've had a
2 chance to read it.

3 A. Okay.

4 Q. Does this help refresh your memory about
5 what happened?

6 A. Yes.

7 Q. Okay. So what do you remember about this
8 situation regarding the contract?

9 A. I remember seeing the contract.

10 Q. Okay.

11 A. Or seeing something that resembled a
12 contract. I think when Dr. Steele asked that they
13 be approved to continue with the grading model, he
14 was denied.

15 Q. Okay. He called an edgenuity employee and
16 it said attempted to intimidate them into going
17 along with his scheme, correct?

18 A. That's what it says.

19 Q. Okay. Under recommendations and
20 violations that occurred, it cites Tennessee Code
21 Annotated 39-14-136, correct?

22 A. Yes.

23 Q. Are you the person that determined that
24 this was a violation of this statute?

25 A. I'm not sure. I'm not intimately familiar

1 with all the statutes, but I used that book as a
2 reference and may have had some guidance from
3 somebody in that arena.

4 Q. Okay. And the recommendation was to
5 follow the legal and policy requirements and
6 misdemeanor up to and including reporting to the
7 Tennessee Department of Education and termination,
8 correct?

9 A. Yes.

10 Q. Did you collaborate with Dr. Cathey on
11 this recommendation?

12 A. I believe so.

13 Q. And because you're the person that wrote
14 this, if -- do you have any reason to believe that
15 this is not accurate, this document?

16 A. I believe it was accurate to the best of
17 our ability at the time.

18 Q. If it's in this document, that would be
19 something that was the result of your investigation,
20 correct?

21 A. Yes.

22 Q. Okay.

23 MS. HARBISON: I'd like to make this the
24 next-numbered exhibit.

25 MR. FOX: No objection.

1 (WHEREUPON, the
2 previously-mentioned document was
3 marked as Exhibit Number 6.)

4 BY MS. HARBISON:

5 Q. Do you recall a law firm conducting an
6 investigation into human resources policies sometime
7 in late 2018, early 2019?

8 A. Yes.

9 Q. Do you recall that the outcome of that
10 investigation was that there were some human
11 resources practices, specifically regarding
12 investigations that were not adequate?

13 A. I don't remember specifically the
14 findings.

15 Q. Do you remember if anything was done after
16 that investigation concluded to change anything
17 within your department?

18 A. I don't know. I can't remember. I know
19 that there was some adjustments staffing-wise, may
20 have supported the addition of somebody else in our
21 department, but I can't remember exactly all the
22 things. I can't even remember the name of the
23 organization that did it.

24 Q. Could it have been Bone McAllester?

25 A. Yes, that's the name.

1 Q. What staffing changes?

2 A. I -- it impacted the structure of my
3 reporting, because they eliminated the person above
4 me, and I reported directly to the chief after that.
5 But that didn't happen right away, but it did happen
6 like within months of that reporting.

7 Q. Who was eliminated?

8 A. Sharon Pertiller. She was executive
9 officer of HR.

10 Q. Any other changes that you can think of
11 that happened as a result of that investigation?

12 A. I don't remember.

13 Q. Do you know if anyone was disciplined as a
14 result of that investigation?

15 A. I don't know. Like I said, I know that
16 Sharon's position was eliminated, I know that
17 Deborah Story retired around the same time. She was
18 the chief HR officer. Tony Majors came in as the
19 chief human resources officer, so there were some
20 adjustments, but specifically I can't remember, you
21 know, exactly what happened.

22 Q. Going back to the doctor -- well, actually
23 let me ask this question first. Was there any
24 training that you or anyone in your department
25 underwent after that investigation concluded?

1 A. I can't think of any specific training
2 that we underwent. It might have encouraged us to
3 do some professional development, but I can't
4 remember specifically.

5 Q. Going back to the Dr. Steele issue, was
6 your role with regard to that issue simply as an
7 investigator?

8 A. No, unfortunately not. I was over the
9 high school, and so when there was a recommendation
10 for discipline, I also handled that. I also had to
11 handle the reporting to the State, so I had multiple
12 pieces that I was responsible for.

13 Q. How were you involved in the discipline?

14 A. The recommendation comes to our department
15 for the discipline by the executive director or
16 maybe it was Dr. Cathey at the time, I can't
17 remember who made the recommendation for discipline,
18 and then we review the information to see if it's
19 adequate for the level of discipline requested.
20 Then I would bring that to my boss, which would be
21 at the time, either Ms. Pertiller or Mr. Majors --
22 Dr. Majors, and we would evaluate what would happen
23 based on the recommendation, and then it would go to
24 Dr. Battle to review, or whoever the director of
25 schools was at the time.

1 Q. Do you remember what recommendation came
2 out of your office?

3 A. No, not specifically. I mean, we
4 recommend that it be addressed, whether it's
5 corrective or disciplinary action, the level, you
6 know. At that time, I don't remember specifically
7 what was recommended.

8 Q. Okay. Do you know that Dr. Cathey
9 recommended that he be terminated due to the
10 seriousness of the violation?

11 A. Actually I -- when you say that, I think I
12 recall him originally requesting termination.

13 Q. Did he request that to your office?

14 A. The letter would come to us, his
15 recommendation would come to us, but then ultimately
16 the director of schools makes the decision.

17 Q. Were you present at the meeting between
18 Dr. Cathey and Dr. Battle where they discussed how
19 Dr. Steele would be disciplined?

20 A. I don't remember if I was or wasn't.

21 Q. Is that something that you would remember
22 because Dr. Battle was there?

23 A. Well, part of our process back then was to
24 meet with Dr. Battle with the executive directors
25 and the principals if the principals were making the

1 recommendation, but that process has involved over
2 the years. I'm not exactly sure when it changed.
3 So we don't directly interact with Dr. Battle. It
4 pretty much goes through the chief, although, we
5 will draft documents and she'll review them, and if
6 she still has questions, then, you know, kind of
7 goes back and forth.

8 But I don't remember being in a meeting,
9 it doesn't mean I wasn't.

10 Q. Okay. Do you know that Dr. Battle did not
11 take Dr. Cathey's recommendation to terminate Dr.
12 Steele?

13 A. Yes, because Dr. Steele is still working
14 for us.

15 Q. Do you know that information from any
16 other source other than the fact that Dr. Steele is
17 still working for Metro?

18 A. I think I might have had to been party to
19 the drafting of the sending of the documents related
20 to the discipline action, but I also was responsible
21 for reporting it to the State, too, yes, I would
22 know it through that process.

23 Q. Okay. And were you told what kind of
24 discipline he would have after Dr. Battle decided
25 not to terminate him? Let me ask a better question.

1 Did you have any -- after Dr. Battle made the
2 decision not to terminate him, did you have any
3 input into how he would be disciplined in the
4 alternative?

5 A. No.

6 Q. Have you ever had to report someone to
7 the -- or have you ever had to report another
8 employee other than Dr. Steele for grade
9 falsification?

10 A. No. Other types of testing infractions,
11 yes.

12 Q. Who does it get reported to?

13 A. It's the State Board of Education
14 Licensure Division.

15 Q. Do you recall who else you had to report
16 to the Board of Education for testing infractions?

17 A. There was a teacher and -- not a proctor,
18 but the coordinator, the testing coordinator at a
19 school that was reported. I believe it was last
20 year, but I can't remember the names.

21 Q. Do you remember what the substance of the
22 infractions were?

23 A. They allowed students to test remotely
24 when they weren't supposed to. They went beyond the
25 limit of timeframes allotted for testing, and it

1 ended up being like 20 students' grades were voided,
2 so that resulted in discipline for two individuals
3 that I'm aware of.

4 Q. But that wasn't related to falsification
5 of grades, correct? It was --

6 A. No.

7 Q. Okay. Are you aware of anyone else that
8 has had substantiated allegations of grade
9 falsifications other than Dr. Steele?

10 A. No.

11 Q. Okay. Why did it fall to you to report
12 Dr. Steele to the Department of Education?

13 A. It's our department's responsibility to
14 file the reports with the State. We initiate the
15 reporting. They're actually submitted by a director
16 of schools executive assistant, but we create the
17 document because we deal with the discipline, so
18 it's logical that they go hand in hand.

19 Q. But that doesn't have to do with protected
20 classes?

21 A. No, it doesn't, but it's part of our
22 function.

23 Q. What other functions do you have that are
24 outside of investigating allegations related to
25 discrimination, harassment or retaliation related to

1 protected classes?

2 A. So we -- we process admin leaves, which is
3 any time somebody is put on administrative leave, to
4 investigate whether it's a school level
5 investigation or our level of investigation, or, you
6 know, if it's an investigation that they're
7 conducting up in Dr. Changas' office, which has to
8 do with testing.

9 So we place them on administrative leave,
10 we move them from administrative leave for
11 certificated. For support, we do the same, but the
12 supervisors for support employees can place them on
13 administrative leave for up to three days' leave.
14 We are the only ones who can extend it. So we do
15 that.

16 We facilitate the discipline process, so
17 if somebody is recommending suspension, demotion or
18 termination, those come through our office. We
19 review the documents to see if it's adequate to
20 support that level of discipline or if the offense
21 is egregious enough to warrant a level of
22 discipline. We have interactive conversations with
23 our leadership, and then ultimately it's the leader
24 that determines the level they're going to
25 recommend, but if it's a certificated employee, it's

1 the director of schools that has to support those
2 decisions.

3 Q. Okay. Anything else?

4 A. So discipline, investigations, I handled
5 second level grievance -- second level grievance,
6 and then I do some -- like if somebody has an injury
7 on duty and they appeal it, they appeal it to me.
8 Those aren't as frequent. Grievances aren't as
9 frequent.

10 State board reporting, discipline, admin
11 leave. We also facilitate training in our -- I
12 don't want to be sarcastic here, but like when we
13 can or when there's an opportunity, we like to take
14 advantage of and facilitate training to leaders,
15 whether it's regarding our processes, the
16 administrative leave process, the discipline
17 process, what we look for in terms of documentation
18 to support actions that we promote in a
19 developmental environment so that it's not a gotcha
20 environment.

21 You know, we try to help leaders support
22 the employees they have and develop the employees
23 they have versus just look to terminate.

24 Q. You said a comment that you don't want to
25 be sarcastic, is what you were going to say is that

1 you really don't have time to do that type of
2 training?

3 A. No. I think we have to make time to do
4 that, because it's important and it's important that
5 we get in front of the leadership and have those
6 conversations, because that's the only time that
7 they really open up and ask questions that they
8 might be afraid to ask otherwise.

9 I think knowledge is power. I think if
10 you give them knowledge, then they are better
11 equipped to handle situations that they're being
12 asked to handle at their level.

13 Q. And that's to keep them from just
14 terminating someone, for example?

15 A. We want to encourage people to retain
16 individuals that are obviously worthy of being
17 retained and develop people. It's just a good
18 practice. I mean, if you're in a developmental mode
19 and you develop people and you support people,
20 they'll be more successful, you'll be more
21 successful versus the other alternative.

22 Q. You said earlier that there were rumors
23 that there were certain people that were
24 untouchable. Who is rumored to be untouchable,
25 whether you have personal knowledge about the truth

1 or the falsity of that or not?

2 MR. FOX: Objection to the form.

3 THE WITNESS: The only person that I heard
4 that about was Dr. Braden. Both Dr. Bradens,
5 because they had been with the district for so long
6 that they felt that their claims would not be looked
7 into because they knew people, but that didn't
8 necessarily protect them, because we still had to
9 look into it. I was not going to be deflected
10 because somebody said that they were protected
11 people.

12 BY MS. STEINER:

13 Q. Is one of the people that was alleged to
14 have protected Dr. Braden, Dr. Battle?

15 A. I don't know who they protected. It was
16 just -- whether it was somebody on the board. I
17 don't know. I don't know. I don't think Dr. Battle
18 was -- I don't remember what her role was at the
19 time that was all going on.

20 Q. I want to make sure I'm clear on
21 something. You testified earlier about scuttlebutt
22 or rumors about fear of retaliation. My
23 understanding about your testimony was that you were
24 saying, if it's not in front of me, there is nothing
25 I can do about it; is that correct?

1 A. If facts aren't presented that give me
2 some substance to look into, it's hard to just go
3 after a general feeling about something substantive
4 to go after.

5 Q. Is it possible that people might be scared
6 to come and complain if the fear is that they're
7 going to be retaliated against if they do so?

8 A. I believe that it creates an environment
9 of a cycle, cyclical thing where people are afraid
10 to talk, they don't talk. It's not an environment
11 that I promote. I'm always going to encourage
12 people to talk, because we can't fix anything if we
13 don't know about it. I've never been deferred or
14 discouraged from looking into something because it
15 involved somebody that they felt might be, you know,
16 whatever. I try to be as objective, fair-minded,
17 and to keep the static out when I'm looking into
18 things.

19 Q. But it is possible that people may be
20 scared to complain because of this environment,
21 whether perceived or real, that they may be
22 retaliated against, correct?

23 A. If people perceive that, if their fear is
24 real, then it probably does discourage them from
25 doing things, but I can't speak to how everybody

1 processes that. If I were to tell you how many --
2 and I don't even know how many, but there is plenty
3 of people that come to us and complain and I
4 would -- I don't know, I mean, they say they fear
5 retaliation because they complain, so it's our job
6 from that point forward to ensure that they're not,
7 based on that situation. But people complain. I
8 don't know how real that is. I haven't seen it of
9 late, let's put it that way.

10 Q. Okay. Let's narrow in a little bit, okay?
11 It is possible, based on your years of experience,
12 that if there is a culture that people are scared,
13 that if they complain they'll be retaliated against,
14 that there may be things that you don't know about
15 that is going on because they might be scared to
16 come to you to complain, right?

17 A. That's probably a decent, speculative
18 assumption --

19 Q. Okay.

20 A. -- that I try not to make.

21 Q. Whose job would it be within Metro to
22 investigate whether that is true or not?

23 A. I don't know. I mean, I don't know how --
24 I mean, I know that they've instituted some surveys,
25 anonymous surveys that have given avenue to some of

1 that. I mean, I participated in some cultural
2 assessments of departments, but overall is there a
3 single unit that's responsible for that? I don't
4 know. I think that logically they would say it
5 resided in HR, but we aren't really structured so
6 that we have that kind of capability to do cultural
7 assessments of the population.

8 Q. Do you even have the capacity to
9 investigate things like that, meaning things that
10 are not in front of you, based on facts coming from
11 a person that has come to complain?

12 MR. FOX: Objection to the form.

13 THE WITNESS: I think we would do our best
14 to investigate it, but I don't know. Depends on
15 what is needed. We have partnerships with the
16 different departments that help provide us with
17 data. We don't do that ourselves. There's an audit
18 department, so if there's financial things, there's
19 a testing department. So if there's testing things,
20 we have relationships with different organizational
21 parts of the organization, so we would try to make
22 sure it resides in the right place if something is
23 addressing their concerns, but culturally when it's
24 something broad like that, I don't know where that
25 would reside.

1 BY MS. HARBISON:

2 Q. Okay. And to go back to my question, your
3 department probably would not have the capacity to
4 do anything about that because you only have three
5 investigators, correct?

6 A. It would be very hard for us to.

7 Q. Okay. If someone complains about
8 retaliation, how do you determine whether or not
9 they've been retaliated against?

10 A. Well, it depends on if it's lawful
11 retaliation or unlawful retaliation. Like people
12 say they're retaliated against by being disciplined
13 or held accountable, but they're being held
14 accountable for a legitimate business reason.
15 That's not retaliation if there's a legitimate
16 business reason for the action taken.

17 Retaliation in terms of them participating
18 in an investigation and then all of a sudden there's
19 been some extra dose of correction or whatever, we
20 would look into that.

21 But if it's -- you know, they're saying,
22 I'm being harassed and they're saying they're being
23 harassed, but in actuality they're being held
24 accountable because they're not showing up to work
25 on time. They say it's harassment, I say it's --

1 we're addressing your performance issues. So we
2 have to make a determination when things come to us.

3 Q. Okay.

4 MS. HARBISON: I don't have any other
5 questions.

6 MS. STEINER: Did you have something?

7 MR. FOX: No.

8 REDIRECT EXAMINATION BY MS. STEINER:

9 Q. When you said that you investigate the
10 discipline that's given to the principals, does that
11 include discipline for performance reasons?

12 A. I process the discipline, I look over
13 documentation, I present that information to Dr.
14 Battle. Ultimately, she decides what she can
15 support and what she can't. She does expect us to
16 kind of look at consistency factors across the
17 district, so I think she processes things based on
18 things that we present to her, but we coordinate and
19 we administrate -- or coordinate is more likely an
20 accurate terminology. We coordinate the gathering
21 of the evidence and we present it.

22 Q. Okay. So then if there is an issue with
23 the performance of a principal, your department
24 gathers the information and you coordinate and you
25 present it to Dr. Battle?

1 A. Well, if it's for a principal, their
2 supervisor, their direct supervisor would be
3 presenting that case. We're just the facilitator of
4 the processes in that regard.

5 Q. Okay. And as the facilitator, what do you
6 do?

7 A. We pull the data, the documentation
8 together, the -- so say there's an executive
9 director that's making a recommendation for a
10 suspension, we ask them what levels of corrective
11 action or disciplinary action occurred prior, if
12 there's any other documents that they addressed for
13 performance issues, we'd ask for all the
14 documentation leading up to the point. Or if they
15 did an investigation and their findings were such
16 that warranted significant action, we would just
17 pretty much pull all that stuff together, you know,
18 kind of coordinate whether or not there's a open DCS
19 case, whether or not law enforcement is
20 investigating, to just understand all the aspects of
21 it before it's presented to Dr. Battle.

22 Q. And that includes job performance of
23 principals, correct?

24 A. Yes.

25 Q. Did you do that for Dr. Bailey's case?

1 A. I did not.

2 Q. Do you know of anyone in your department
3 who did an investigation, pulled everything together
4 and coordinated it for presentation to Dr. Battle?

5 A. Well, that -- my understanding was that it
6 was a nonrenewal, so we're not involved in that.
7 That's handled by the HR manager hiring managers.

8 Q. Okay. And who is the hiring manager for
9 Dr. Bailey?

10 A. I don't know who handled that.

11 Q. So if you're recommending someone for
12 discipline, and that includes job performance, would
13 that be a nonrenewal for job performance?

14 A. Yes.

15 Q. Okay. So then if someone is being
16 nonrenewed and it's job performance related, it
17 needs to go through your department?

18 A. No. I'm sorry. You misunderstood that.
19 If they're nonrenewals for job performance, those
20 are evaluated through the budgeting process. You
21 know, they're suggesting somebody for nonrenewal.
22 They will ask if there are folks that have issues or
23 they'll ask us if we have documentation supporting a
24 nonrenewal for individuals, but other than that,
25 we're not involved in that process, the nonrenewal

1 process.

2 Eligibility, non-eligibility, usually if
3 it's a budget restructure, or say a closing of a
4 school, they would be eligible for rehire. If it
5 was performance based, it's possible they would be
6 non-eligible for rehire.

7 Q. If it's performance based and not eligible
8 for rehire, they've lost their job, correct?

9 A. Correct.

10 Q. Now, did anyone ask you for documentation
11 about Dr. Bailey?

12 A. No.

13 Q. Okay. Have you looked in his employee
14 file by any chance?

15 A. I have not.

16 Q. Should documentation such as -- what
17 documentation would be available for a principal; do
18 you know?

19 A. Well, I think their contracts, their
20 annual contracts, if there were performance issues
21 addressed, they should be there. If there were --
22 what do they call it, individual IPPs, which are
23 individual performance plans, those would be there.
24 If they were involved in an investigation that
25 might -- like any kind of response letter might be

1 there, or an admin leave, written reprimands, but
2 all their hiring documents, all that kind of stuff
3 is in there, too.

4 Q. So any written reprimand, any IPP, any
5 oral counseling, any performance issues should be
6 noted in their employee file?

7 A. Oral counselings may not reside in their
8 employee personnel file. They might just be in what
9 we call a site file. So they don't make it to the
10 personnel file until it's a written reprimand or
11 above.

12 Q. Okay. But all these, the oral counseling
13 actually is put into some sort of a written document
14 form where you can add it to the file if it
15 continues?

16 A. Yes.

17 Q. And all of these things that we've
18 discussed, the IPP, the investigation, should all be
19 put in the employee file?

20 A. Yes, in different sections.

21 Q. Okay. And should an investigation of
22 discrimination or harassment be put in the employee
23 file?

24 A. The investigation itself would be in an
25 investigative file. It doesn't necessarily go in

1 the person's employee file.

2 Q. Okay.

3 A. Unless there's a response that goes in
4 their file.

5 Q. Okay. Now, when you're in one of those
6 time periods where you're getting a lot of different
7 complaints coming in, such as in the Braden matter,
8 do you feel a bit overwhelmed in your department?

9 A. I think it's tense. I think when there's
10 a lot of demands, anything that involves people and
11 knowing that when they're doing public records
12 request that people's lives will be impacted by
13 publication of information. I think that's
14 stressful to me personally.

15 Q. When you said in the Braden matter there
16 were -- it was expressed to you that some of the
17 employees thought Dr. Braden knew people and so they
18 couldn't complain against him, was that because they
19 felt they would be retaliated against?

20 A. I think that people inferred that that's
21 what Dr. Braden would say to them to keep them from
22 complaining on him. I don't know that -- I never
23 knew who he knew that would protect him.

24 Q. Did you know that he was pretty close with
25 Dr. Battle?

1 MR. FOX: Objection to the form.

2 THE WITNESS: I don't know their history.
3 I believe they may have worked together. She's been
4 with the district a long time, he was with the
5 district a long time, but I don't know that
6 relationship at all.

7 BY MS. STEINER:

8 Q. Did you know that he taught her?

9 A. No, I did not.

10 Q. Did you know she had made statements that
11 he was not guilty of anything he was accused of?

12 MR. FOX: Objection to the form.

13 THE WITNESS: I would not know.

14 BY MS. STEINER:

15 Q. Did your department do any sort of
16 investigation about whether or not the individuals
17 who complained about Braden had been retaliated
18 against?

19 A. I believe that there were a multitude of
20 complaints regarding Dr. Braden. And I'm not sure
21 if it went to retaliation or not. I think it
22 possibly did, but I can't remember specifically.

23 Q. Okay.

24 MS. STEINER: That's all.

25 FURTHER THIS DEPONENT SAITH NOT

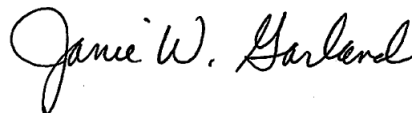
REPORTER'S CERTIFICATION

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

I, Janie W. Garland, LCR#111, licensed court reporter, in and for the State of Tennessee do hereby certify that the above deposition was reported by me and that the foregoing pages of the transcript is a true and accurate record to the best of my knowledge, skills, and ability.

I further certify that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I further certify that I am duly licensed by the Tennessee Board of Court Reporting as a Licensed Court Reporter as evidenced by the LCR number following my name below.



Janie W. Garland, LCR#111

E R R A T A P A G E

I, Mary Ellen Zander, having read the foregoing deposition, Pages 1 through 132, do hereby certify said testimony is a true and accurate transcript, with the following changes (if any):

PAGE	LINE	SHOULD HAVE BEEN
------	------	------------------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

Mary Ellen Zander

BY MS. HARBISON: [3] 96/11 110/4 124/1 BY MS. STEINER: [52] 13/15 14/6 21/20 22/2 22/24 23/20 25/6 25/21 28/3 31/23 32/16 34/7 35/21 37/5 39/20 39/25 40/7 40/14 40/19 41/22 43/9 44/1 48/9 48/21 50/11 55/6 59/3 59/16 60/1 60/7 65/8 67/10 68/10 69/13 70/5 71/8 71/18 72/16 74/20 76/24 80/8 81/16 85/8 85/18 86/4 87/14 90/6 93/21 95/6 120/12 131/7 131/14 MR. FOX: [53] 13/8 13/23 21/19 21/24 22/21 23/11 24/21 25/4 25/18 28/2 31/22 32/2 34/4 35/20 37/1 39/17 39/23 40/3 40/11 40/18 41/21 48/17 50/9 55/5 59/1 59/14 60/4 64/24 67/8 68/7 69/10 70/3 71/14 72/15 76/20 80/7 81/8 84/25 85/15 85/25 87/11 90/3 93/20 95/4 95/11 95/17 96/6 109/25 120/2 123/12 125/7 131/1 131/12 MS. HARBISON: [5] 59/21 59/24 95/15 109/23 125/4 MS. STEINER: [10] 39/24 40/5 43/22 74/11 84/19 85/2 85/14 95/14 125/6 131/24 THE WITNESS: [39] 13/9 13/24 21/25 22/22 23/12 24/22 25/5 25/9 25/19 32/3 34/5 37/2 39/18 40/12 48/18 59/2 59/23 60/5 64/25 67/9 68/8 69/11 70/4 71/7 71/15 76/21 81/9 85/1 85/16 86/1 87/12 90/4 95/5 95/12 96/7 120/3 123/13 131/2 131/13	2022 [2] 1/24 3/2 21st [1] 84/17 222 [1] 2/9 22nd [1] 8/19 2931 [1] 5/17 3 340M [1] 2/9 37201 [1] 2/9 37206 [2] 3/12 3/18 37219 [1] 3/23 39-14-136 [1] 108/21 3:20-CV-01023 [1] 1/5 4 40 [1] 62/11 40 percent [5] 55/20 55/25 63/1 63/1 64/22 43 [1] 4/6 48 [1] 4/8 4th [1] 84/21 5 5/4/20 [1] 4/12 5350 [1] 2/10 6 6/21/20 [1] 4/14 6/24/20 [1] 4/8 613 [1] 3/12 615 [1] 2/10 68251 [1] 3/18 6th [1] 6/5 7 714-5350 [1] 2/10 74 [1] 4/10 8 84 [1] 4/12 85 [1] 4/14 9 95 [1] 4/2 A ability [8] 21/2 21/12 68/22 69/2 73/22 102/4 109/17 132/11 able [3] 21/7 47/8 98/1 about [68] 7/3 7/24 8/1 8/9 8/10 8/12 8/20 9/10 10/17 11/22 11/25 12/16 14/12 24/1 24/15 29/18 33/5 35/23 36/18 37/21 39/14 43/23 45/7 48/10 48/12 50/21 50/21 51/6 51/25 53/25 55/10 55/12 56/5 57/22 59/12 67/25 69/21 74/10 80/15 82/13 83/1 84/5 86/12 96/19 96/25 99/8 100/12 102/12 102/18 103/16 103/20 107/16 108/4 108/7 119/25 120/4 120/21 120/22 120/23 120/25 121/3 121/13 122/14 124/4 124/7 128/11 131/16 131/17 above [3] 111/3 129/11 132/8 abuse [1] 17/5 accepted [2] 56/14 66/25 access [4] 47/1 47/5 60/20 102/5 acclimate [1] 97/16 accord [2] 37/15 65/5 accountable [3] 124/13 124/14 124/24 accurate [7] 19/24 98/19 109/15 109/16 125/20 132/10 133/5	accused [1] 131/11 across [2] 39/7 125/16 action [16] 7/6 13/14 21/9 32/8 32/19 41/14 46/12 50/19 73/12 113/5 114/20 124/16 126/11 126/11 126/16 132/15 actions [4] 22/6 36/24 87/23 118/18 active [1] 47/8 actively [1] 77/8 activity [10] 29/19 30/13 30/24 87/5 87/10 87/21 95/3 95/9 102/13 103/18 actual [4] 69/16 89/25 106/6 107/14 actuality [1] 124/23 actually [17] 10/2 16/20 17/23 29/12 36/12 38/1 39/13 44/8 53/10 86/15 98/18 99/12 102/24 111/22 113/11 116/15 129/13 ADA [1] 99/15 add [1] 129/14 addition [1] 110/20 additional [2] 98/7 98/25 address [7] 5/16 14/23 35/5 54/23 64/3 90/15 94/13 addressed [6] 64/16 75/2 81/11 113/4 126/12 128/21 addressing [2] 123/23 125/1 adequate [6] 73/5 73/8 91/7 110/12 112/19 117/19 adequately [2] 96/15 98/1 adjustments [2] 110/19 111/20 admin [5] 18/16 101/16 117/2 118/10 129/1 administering [1] 28/14 administrate [1] 125/19 administration [3] 38/21 89/24 93/13 administrative [18] 15/12 16/4 16/6 16/20 17/3 17/6 17/8 17/11 17/12 17/16 17/24 66/2 86/12 117/3 117/9 117/10 117/13 118/16 ADRIENNE [6] 1/7 1/13 1/21 22/20 23/1 23/5 advantage [1] 118/14 advocate [1] 90/11 affect [2] 14/14 14/15 affected [1] 95/2 affecting [1] 78/24 afraid [3] 19/21 119/8 121/9 after [15] 10/3 38/2 47/14 64/18 68/11 68/25 77/5 79/22 110/15 111/4 111/25 114/24 115/1 121/3 121/4 again [18] 5/21 20/23 22/23 24/17 27/18 29/3 30/18 34/11 34/24 50/21 56/3 58/4 58/9 70/12 79/7 81/1 86/1 87/24 against [64] 7/5 12/7 15/2 16/8 16/16 16/21 19/7 20/6 20/19 20/24 21/9 22/6 22/7 22/20 23/1 23/5 23/17 23/25 24/6 31/5 31/14 36/24 37/3 37/10 38/18 38/20 38/23 39/4 39/7 39/14 40/21 41/10 41/17 50/25 58/25 59/6 67/7 68/5 68/19 69/2 80/22 80/25 87/8 89/1 89/10 91/9 91/24 93/10 93/24 94/4 102/10 102/11 102/20 102/21 103/19 103/19 121/7 121/22 122/13 124/9 124/12 130/18 130/19 131/18 age [2] 41/9 42/2 agencies [1] 10/19 ago [2] 36/2 43/24 agree [6] 14/7 14/11 21/1 32/17 62/14 75/11 alert [1] 29/5
0 01023 [1] 1/5 1 10 [3] 55/12 55/15 56/17 10 percent [9] 56/1 56/10 56/12 56/15 56/18 57/3 57/22 58/13 61/13 108 [1] 3/22 110 [1] 4/15 111 [2] 132/6 132/24 12,000-plus [1] 98/16 125 [1] 4/3 132 [1] 133/4 136 [1] 108/21 15 [3] 41/5 45/5 47/15 15th [7] 45/16 45/19 45/21 46/7 46/10 46/13 46/14 16 [1] 9/10 196300 [1] 3/23 2 20 [5] 4/8 4/12 4/14 16/25 116/1 2000 [1] 8/23 2006 [1] 10/21 2008 [1] 9/1 2017 [1] 8/15 2018 [13] 8/14 8/18 8/19 9/2 10/22 11/11 17/15 19/3 85/9 85/13 86/5 87/18 110/7 2019 [1] 110/7 2020 [22] 19/3 41/6 45/6 46/7 47/15 55/8 60/9 60/11 70/1 70/16 70/22 70/22 74/9 84/17 84/21 87/19 88/4 88/15 88/22 89/7 89/7 95/1		

A	all [47] 3/3 3/4 4/6 5/9 6/15 6/16 6/20 34/24 36/19 37/17 44/22 45/18 46/6 58/4 60/17 60/22 60/23 61/15 62/17 62/20 64/25 65/1 66/2 72/1 78/14 79/11 90/12 90/18 90/21 94/8 101/22 102/5 105/20 109/1 110/21 120/19 124/18 126/13 126/17 126/20 129/2 129/2 129/12 129/17 129/18 131/6 131/24 allegation [3] 17/5 20/5 38/22 allegations [5] 37/3 39/7 106/7 116/8 116/24 alleged [3] 17/21 30/9 120/13 alleges [2] 41/19 41/24 alleging [1] 50/19 allotted [1] 115/25 allow [1] 56/9 allowed [1] 115/23 almost [3] 55/20 63/1 64/22 along [1] 108/17 already [8] 44/21 46/11 46/12 46/14 68/19 71/1 86/5 99/18 also [12] 23/18 24/15 36/4 38/24 66/5 98/23 101/8 105/1 112/10 112/10 114/20 118/11 alter [1] 72/25 alternative [2] 115/4 119/21 although [3] 41/24 98/12 114/4 always [5] 14/4 65/6 90/11 101/9 121/11 am [13] 7/25 34/8 53/23 54/16 55/16 73/4 78/5 79/8 101/25 106/25 132/13 132/15 132/18 Amy [1] 35/17 Angela [2] 65/13 65/18 Ann [1] 3/10 Anna [1] 47/24 Annotated [1] 108/21 annual [2] 26/14 128/20 anonymous [1] 122/25 another [10] 17/21 26/21 26/22 26/23 27/21 37/15 55/11 74/6 82/6 115/7 answer [2] 21/25 23/9 answered [1] 99/18 answering [1] 23/8 anticipation [2] 20/11 20/13 any [83] 5/24 6/2 9/3 10/19 10/23 10/25 11/2 11/21 12/25 14/3 15/15 15/25 15/25 17/23 19/16 22/15 22/19 23/9 31/6 35/22 36/13 38/7 39/7 42/5 42/9 42/17 44/15 44/19 48/2 52/19 52/24 52/25 53/24 53/25 54/4 54/6 54/13 54/25 55/1 60/15 60/20 67/23 71/10 71/12 74/3 76/16 76/19 80/16 81/3 86/23 87/20 87/20 88/1 88/20 88/21 89/13 91/21 92/10 93/22 94/2 99/14 104/3 104/3 109/14 111/10 111/23 112/1 114/15 115/1 115/2 117/3 125/4 126/12 128/14 128/25 129/4 129/4 129/4 129/5 131/15 132/14 132/15 133/5 anybody [7] 12/4 12/9 12/12 12/21 40/22 64/16 92/9 anyone [29] 11/25 12/6 12/8 12/10 12/19 17/16 22/19 23/21 33/15 35/22 53/15 53/19 61/24 61/25 62/9 64/11 80/20 85/22 88/13 89/4 89/6 93/22 101/23 102/5 111/13 111/24 116/7 127/2 128/10	anything [31] 12/24 13/5 14/23 14/25 15/8 21/21 25/16 25/25 35/3 45/2 45/7 46/6 46/19 68/14 72/9 81/19 83/1 85/16 94/3 94/12 99/10 99/12 101/1 104/4 110/15 110/16 118/3 121/12 124/4 130/10 131/11 anywhere [1] 103/22 appeal [2] 118/7 118/7 APPEARANCES [1] 3/6 appears [1] 75/3 applicants [2] 78/7 78/9 applied [2] 58/18 58/22 applying [2] 33/19 66/7 apprised [1] 96/4 appropriate [2] 15/12 21/9 approval [1] 66/13 approved [2] 66/9 108/13 April [6] 19/2 69/25 70/1 70/16 70/21 71/3 are [61] 3/4 3/4 5/20 5/22 5/22 8/21 10/18 18/7 18/12 18/13 26/9 26/10 27/4 27/16 28/6 29/16 31/4 31/10 32/6 32/14 35/9 36/10 40/24 45/11 46/17 49/17 49/19 51/17 52/9 53/5 53/8 55/12 59/17 65/16 65/24 70/12 76/22 77/4 77/18 78/1 87/1 90/20 96/25 98/24 99/9 99/12 103/9 106/23 106/24 108/23 116/7 116/23 117/14 119/10 119/16 121/9 122/12 123/10 127/20 127/22 128/22 area [1] 103/13 areas [1] 65/24 aren't [6] 98/4 104/1 118/8 118/8 121/1 123/5 arena [1] 109/3 around [7] 44/24 44/25 51/19 81/14 90/24 91/3 111/17 arrived [1] 12/5 as [67] 3/3 3/4 5/2 5/3 13/16 14/23 15/5 20/3 27/7 29/2 29/7 29/12 31/19 32/6 33/12 33/17 34/2 34/16 44/20 45/16 46/7 46/8 47/15 47/20 48/8 49/20 49/21 51/5 52/25 55/7 55/19 57/6 64/7 64/20 65/21 68/19 71/9 73/15 74/19 75/21 80/12 83/17 84/19 84/24 85/6 86/11 86/19 97/7 97/9 100/9 100/9 100/19 107/14 109/1 110/3 111/11 111/13 111/18 112/6 118/8 118/8 121/16 126/5 128/16 130/7 132/19 132/20 ask [22] 20/22 22/22 24/17 33/20 34/11 42/5 44/14 51/15 68/8 82/19 83/12 93/12 102/7 111/23 114/25 119/7 119/8 126/10 126/13 127/22 127/23 128/10 asked [12] 8/1 29/20 29/22 30/3 40/13 44/21 51/17 82/22 100/5 105/15 108/12 119/12 asking [9] 24/7 29/10 34/5 43/19 88/6 90/4 92/1 92/2 98/14 asks [5] 18/8 42/12 84/18 86/21 101/19 aspects [1] 126/20 assess [4] 69/17 69/19 70/8 70/17 assessed [2] 70/20 71/11 assessing [1] 71/13 assessment [3] 70/2 70/7 94/24 assessments [3] 94/11 123/2 123/7 assigned [2] 65/24 81/24 assignment [2] 61/15 62/16 assist [1] 103/8	assistance [1] 70/13 assistant [9] 18/16 38/16 39/2 88/20 89/9 97/6 107/19 107/23 116/16 assisted [1] 105/16 Associates [1] 2/8 association [1] 33/25 assume [4] 25/22 52/22 79/2 90/25 assuming [2] 62/22 69/24 assumption [1] 122/18 assumptions [1] 62/19 assure [2] 14/16 94/3 asteiner [1] 3/13 atmosphere [2] 12/11 89/18 attack [1] 77/2 attempted [1] 108/16 attempts [4] 61/15 61/21 61/25 62/20 attention [14] 13/22 18/20 50/5 50/13 50/24 51/9 67/12 67/14 67/18 67/19 80/23 82/24 86/19 89/20 attorney [5] 3/11 3/17 18/15 22/8 32/23 audit [1] 123/17 August [2] 86/5 87/18 authorities [1] 21/13 available [6] 45/24 47/7 60/19 72/21 79/11 128/17 avenue [2] 2/9 122/25 aware [36] 6/1 8/6 14/20 15/8 18/22 18/24 18/25 19/15 19/17 23/13 33/10 37/12 37/16 37/19 37/23 39/13 40/15 53/23 54/16 55/12 55/18 55/22 55/23 67/2 67/4 71/2 73/4 77/9 77/11 78/5 83/19 83/22 85/9 85/19 116/3 116/7 away [2] 8/24 111/5
	B		
	B-A-T-E-Y [1] 18/9 bachelor's [1] 9/24 back [21] 22/14 30/21 33/2 35/5 43/14 43/17 43/18 43/23 44/19 44/22 57/16 68/23 71/10 74/7 100/4 107/22 111/22 112/5 113/23 114/7 124/2 background [2] 9/23 66/3 BAILEY [46] 1/16 3/8 4/8 4/12 15/7 19/1 19/5 19/17 19/20 20/18 21/16 21/22 22/10 22/11 22/18 24/5 24/19 25/13 25/17 25/20 31/19 31/25 32/24 33/1 41/5 41/8 42/7 42/10 46/8 47/15 68/17 69/20 70/14 73/15 74/2 75/2 75/4 75/20 77/6 84/21 85/12 85/22 86/14 89/15 127/9 128/11 Bailey's [9] 22/5 25/23 26/2 28/19 28/22 32/22 69/7 84/20 126/25 Barbara [1] 18/10 Barnes [14] 25/2 25/3 25/8 31/2 82/20 83/7 83/7 83/9 83/20 83/23 84/5 84/8 84/14 84/15 base [1] 91/15 based [16] 29/16 29/18 32/5 34/14 36/14 41/13 68/21 99/14 107/14 112/23 122/7 122/11 123/10 125/17 128/5 128/7 basically [6] 8/1 9/10 33/13 33/16 97/7 98/11 basis [4] 13/10 15/11 66/15 99/23 Batey [26] 18/8 18/19 19/2 19/5 19/10 24/5 24/15 26/5 48/24 49/3 49/9 50/8 50/16 50/18 51/8 52/1 52/6 52/7 52/22 54/20 56/3 62/2 69/20 69/23 69/24 71/2 Batey's [3] 50/4 50/13 50/24		

<p>B</p> <p>BATTLE [60] 1/7 1/13 1/21 4/12 15/1 15/3 15/21 16/1 19/7 19/18 20/6 20/19 20/24 21/17 21/23 22/20 23/1 23/6 23/17 28/18 28/24 31/20 35/2 35/3 35/7 35/24 36/4 39/8 39/9 39/12 39/13 41/10 41/18 41/24 42/6 42/21 44/7 44/8 53/24 54/1 54/3 54/3 85/24 86/2 86/13 112/24 113/18 113/22 113/24 114/3 114/10 114/24 115/1 120/14 120/17 125/14 125/25 126/21 127/4 130/25</p> <p>Battle's [1] 22/7</p> <p>be [133] 10/1 14/18 15/2 15/13 15/21 15/22 16/13 16/16 16/16 18/22 18/24 19/6 19/24 20/24 21/7 22/10 23/14 23/25 26/4 26/9 27/3 27/5 27/13 27/17 27/21 30/16 31/1 32/5 32/8 32/9 32/11 32/12 32/20 34/25 35/2 36/2 39/15 40/20 43/7 44/9 45/22 46/22 46/22 47/8 47/11 48/1 49/20 49/21 53/21 54/23 56/15 56/18 56/21 57/10 58/7 61/13 61/15 62/20 64/1 67/12 69/6 71/15 71/16 72/2 74/15 75/3 75/17 76/17 77/16 79/11 79/14 79/23 81/21 82/7 87/8 89/19 89/20 91/9 91/24 91/25 92/2 92/7 93/9 93/24 94/4 96/21 98/1 100/21 101/6 102/15 102/23 103/18 108/13 109/18 112/20 113/4 113/9 113/19 115/3 118/12 118/25 119/8 119/20 119/20 119/24 120/6 120/9 121/5 121/7 121/15 121/16 121/19 121/21 122/13 122/14 122/15 122/21 124/6 126/2 127/13 128/4 128/5 128/17 128/21 128/23 128/25 129/5 129/8 129/18 129/22 129/24 130/12 130/19</p> <p>beating [1] 31/20</p> <p>became [4] 13/7 19/18 77/9 77/11</p> <p>because [73] 15/3 19/7 19/9 20/20 22/6 31/11 33/25 37/16 37/21 39/3 39/16 42/21 43/16 44/6 45/17 46/21 47/25 48/23 49/13 50/25 56/17 56/24 58/24 59/6 60/18 62/15 62/24 63/11 64/9 65/10 67/6 67/19 68/15 72/1 73/17 74/7 75/8 76/5 78/22 83/1 85/22 85/23 94/13 95/10 98/10 102/1 102/11 103/20 103/23 104/3 105/12 105/16 106/1 107/3 109/13 111/3 113/22 114/13 116/17 119/4 119/6 120/5 120/7 120/8 120/10 121/12 121/14 121/20 122/5 122/15 124/4 124/24 130/18</p> <p>becomes [2] 101/24 101/25</p> <p>been [57] 5/2 6/20 13/21 14/13 15/17 16/22 16/24 17/15 20/6 20/8 24/15 29/10 29/20 30/1 30/3 35/6 37/13 46/14 47/24 50/20 52/1 52/2 54/12 55/25 62/4 62/7 63/2 63/6 67/13 67/14 68/18 69/1 71/1 73/20 75/8 77/2 77/10 79/9 80/23 81/2 86/18 87/18 89/14 89/15 98/8 103/19 106/14 107/19 110/24 114/18 120/5 121/13 124/9 124/19 131/3 131/17 133/7</p> <p>before [16] 6/10 9/3 9/18 11/13 11/17 49/21 63/2 69/25 70/16 73/24 74/22 74/24 85/1 96/9 101/12 126/21</p> <p>beginning [1] 96/2</p> <p>behalf [2] 85/12 85/22</p> <p>behavior [1] 104/6</p>	<p>being [38] 7/13 16/21 24/6 27/17 31/4 31/7 31/14 32/4 33/12 35/23 40/22 49/8 50/25 55/13 56/2 56/5 59/25 70/24 73/4 75/18 86/12 96/12 102/10 102/11 102/20 102/21 105/18 106/24 114/8 116/1 119/11 119/16 124/12 124/13 124/22 124/22 124/23 127/15</p> <p>believe [47] 7/4 7/8 7/22 14/15 19/2 23/12 25/1 25/5 28/23 32/3 37/13 38/15 38/16 39/10 45/18 47/22 49/1 49/6 49/7 49/11 49/20 51/5 52/6 53/2 55/14 56/3 56/11 56/16 59/9 63/20 65/4 66/25 70/16 70/24 76/15 76/22 84/4 88/17 94/18 100/17 109/12 109/14 109/16 115/19 121/8 131/3 131/19</p> <p>believed [1] 12/13</p> <p>believes [1] 41/16</p> <p>Belmont [1] 48/11</p> <p>below [1] 132/21</p> <p>besides [3] 17/22 22/18 45/6</p> <p>best [5] 14/17 101/8 109/16 123/13 132/10</p> <p>better [3] 98/21 114/25 119/10</p> <p>between [3] 4/6 15/19 113/17</p> <p>beyond [1] 115/24</p> <p>Biggers [3] 18/11 18/11 18/15</p> <p>Biggers-Matthews [1] 18/11</p> <p>bit [7] 8/20 55/10 67/25 74/10 97/17 122/10 130/8</p> <p>blew [1] 31/12</p> <p>board [23] 35/4 35/8 35/9 35/10 35/11 35/14 35/18 35/23 36/1 36/5 36/13 42/22 44/6 44/8 47/23 66/4 74/12 94/7 115/13 115/16 118/10 120/16 132/19</p> <p>Bone [1] 110/24</p> <p>book [3] 56/21 60/23 109/1</p> <p>born [1] 8/22</p> <p>boss [12] 29/23 30/2 34/20 34/21 54/3 59/10 83/5 83/6 104/2 105/23 106/17 112/20</p> <p>both [3] 16/11 106/10 120/4</p> <p>bottom [1] 103/4</p> <p>bought [2] 50/8 67/17</p> <p>boundaries [1] 21/11</p> <p>Box [2] 3/18 3/23</p> <p>Braden [22] 36/11 36/17 36/20 36/23 38/8 38/9 38/19 38/24 39/4 39/8 39/15 89/1 100/17 100/25 120/4 120/14 130/7 130/15 130/17 130/21 131/17 131/20</p> <p>Braden's [3] 37/8 37/22 38/23</p> <p>Bradens [1] 120/4</p> <p>break [5] 40/3 40/6 56/23 59/12 59/15</p> <p>Brian [2] 79/25 80/3</p> <p>Bridget [1] 57/25</p> <p>Brief [2] 40/6 59/15</p> <p>Briggs [1] 2/8</p> <p>bring [6] 18/19 51/8 67/19 102/24 104/12 112/20</p> <p>bringing [1] 39/3</p> <p>brings [3] 18/17 20/21 54/17</p> <p>broad [3] 26/20 94/14 123/24</p> <p>Brooks [4] 3/21 6/25 7/1 8/16</p> <p>brooks.fox [1] 3/24</p> <p>brother [5] 15/3 15/4 19/9 20/20 22/7</p> <p>brother's [1] 41/14</p> <p>brought [22] 13/21 24/18 24/19 39/8 39/9 39/22 50/4 50/13 50/24 57/14 66/3 67/12 67/13 71/2 80/23 82/10</p>	<p>82/24 83/9 85/11 85/21 86/18 89/20</p> <p>budget [5] 41/20 41/25 63/23 75/6 128/3</p> <p>budgeting [1] 127/20</p> <p>Buntin [1] 3/10</p> <p>business [2] 124/14 124/16</p> <p>buying [2] 5/20 5/22</p> <hr/> <p>C</p> <p>calculate [1] 70/6</p> <p>call [3] 49/24 128/22 129/9</p> <p>called [3] 5/2 91/1 108/15</p> <p>came [27] 13/16 15/7 22/3 36/18 37/25 38/6 40/16 49/9 52/6 57/6 76/7 86/19 88/5 88/8 88/10 88/14 91/16 92/22 93/14 94/6 97/10 97/11 100/19 102/7 102/8 111/18 113/1</p> <p>can [61] 6/6 13/12 14/22 14/23 15/13 15/19 16/19 17/18 17/22 21/15 21/21 22/18 22/22 23/22 24/17 25/16 25/25 27/25 39/22 39/23 40/3 40/3 47/11 49/20 53/15 54/4 54/6 59/21 60/20 61/19 61/21 62/6 64/17 64/17 64/22 65/22 68/16 73/24 76/9 76/20 79/6 82/9 87/19 88/13 88/17 89/3 89/6 93/6 98/18 100/9 100/13 101/8 104/21 107/25 111/10 117/12 117/14 118/13 120/25 125/14 129/14</p> <p>can't [42] 6/15 7/16 13/1 16/2 16/23 17/15 18/1 20/15 21/18 21/25 30/8 36/7 37/4 39/15 60/10 72/5 73/1 73/17 76/7 76/11 77/11 84/2 88/7 88/18 89/1 89/12 93/3 94/23 100/22 101/8 110/18 110/21 110/22 111/20 112/1 112/3 112/16 115/20 121/12 121/25 125/15 131/22</p> <p>cancer [1] 77/1</p> <p>candidate [1] 79/5</p> <p>cannot [7] 17/14 25/19 54/8 57/13 59/5 67/24 87/8</p> <p>capability [1] 123/6</p> <p>capacity [3] 32/15 123/8 124/3</p> <p>capped [1] 55/25</p> <p>caption [1] 3/3</p> <p>care [2] 45/1 93/5</p> <p>career [1] 100/24</p> <p>Carolina [1] 9/1</p> <p>Carrasco [1] 11/17</p> <p>case [29] 1/7 6/5 6/24 7/3 7/7 8/14 13/10 13/10 13/21 30/8 38/9 40/17 46/20 46/20 61/10 61/13 62/20 62/20 69/7 70/10 70/10 71/17 95/23 95/24 105/11 126/3 126/19 126/25 132/16</p> <p>cases [7] 6/14 6/16 6/17 6/18 18/21 51/20 98/4</p> <p>CATHEY [17] 1/17 3/15 23/15 80/20 81/5 95/23 95/25 102/25 103/3 105/15 106/9 106/14 106/17 109/10 112/16 113/8 113/18</p> <p>Cathey's [1] 114/11</p> <p>caused [1] 96/24</p> <p>central [6] 59/5 65/19 67/11 90/24 90/25 91/3</p> <p>certain [4] 16/2 23/3 107/13 119/23</p> <p>certificate [2] 3/3 47/2</p> <p>certificated [2] 117/11 117/25</p> <p>certificates [1] 47/6</p> <p>certification [2] 10/21 132/1</p> <p>certifications [1] 10/23</p> <p>certified [2] 10/8 10/18</p>
--	--	--

<p>C</p> <p>certify [4] 132/8 132/13 132/18 133/5 cetera [5] 32/12 32/13 70/9 70/9 99/16 Chad [4] 80/9 80/9 80/12 80/14 chair [8] 35/4 35/12 44/6 44/6 44/9 44/12 47/23 47/23 chairman [2] 35/8 42/22 chance [2] 108/2 128/14 Changas' [1] 117/7 change [7] 61/14 62/16 62/25 63/23 75/25 77/12 110/16 changed [2] 5/9 114/2 changes [4] 66/5 111/1 111/10 133/5 charge [6] 22/16 22/19 22/25 23/4 82/7 93/14 Charleston [1] 9/10 chief [9] 19/12 24/23 29/25 67/15 81/1 111/4 111/18 111/19 114/4 child [2] 17/6 48/16 childhood [1] 9/25 children [1] 48/13 choice [6] 55/8 55/19 60/15 61/12 62/5 64/20 choose [1] 26/15 Chris [1] 31/2 circumstance [1] 20/17 circumstances [4] 16/12 16/18 20/16 65/1 cites [1] 108/20 Civil [1] 3/2 claim [24] 7/4 8/4 16/8 16/15 17/13 17/25 31/16 31/25 32/24 33/1 38/17 38/20 49/5 50/17 52/25 53/20 53/20 80/18 80/22 80/25 82/10 82/12 98/18 104/3 claimed [4] 23/16 37/20 39/2 81/23 claiming [4] 16/7 22/5 29/1 55/24 claims [8] 12/7 12/17 14/9 17/4 17/10 17/10 53/25 120/6 clarification [4] 18/9 42/12 84/18 86/22 class [10] 14/3 29/16 30/16 49/8 54/9 90/21 98/10 98/21 99/21 102/14 classes [6] 99/5 99/9 99/14 99/17 116/20 117/1 classroom [1] 48/14 clear [1] 120/20 client [2] 56/5 56/6 client's [1] 45/2 close [1] 130/24 closely [2] 15/10 87/3 closing [1] 128/3 Coach [4] 31/20 85/24 86/2 86/13 Code [1] 108/20 collaborate [3] 103/25 104/1 109/10 collecting [1] 76/5 college [1] 10/3 come [21] 12/15 31/11 39/6 52/15 52/18 52/19 59/10 59/11 68/5 72/25 77/21 78/14 101/5 113/14 113/15 117/18 121/6 122/3 122/16 123/11 125/2 comes [10] 15/1 23/23 53/5 64/7 68/12 98/19 99/19 103/16 104/3 112/14 comfortable [1] 23/7 coming [6] 9/8 28/25 29/4 48/1 123/10 130/7 comment [1] 118/24 common [3] 90/24 91/3 91/6 communications [1] 101/21 community [1] 103/10</p>	<p>Compass [1] 47/7 compensation [5] 63/5 63/8 63/12 63/25 64/12 complain [10] 29/5 121/6 121/20 122/3 122/5 122/7 122/13 122/16 123/11 130/18 complained [9] 37/8 37/21 56/5 57/2 69/20 70/14 92/4 93/8 131/17 complaining [1] 130/22 complains [3] 64/18 103/16 124/7 complaint [62] 15/10 16/13 16/21 17/17 18/17 19/1 32/22 33/6 33/9 33/10 33/13 33/14 37/17 41/9 44/25 45/3 47/14 48/23 49/2 49/23 51/4 51/21 52/20 53/4 53/16 53/20 54/5 54/14 54/17 54/21 55/2 55/23 56/2 57/21 58/2 58/12 61/20 62/22 62/23 63/21 64/10 64/14 68/21 81/9 81/11 81/12 81/13 82/3 82/5 83/8 83/18 85/10 85/19 85/20 87/9 88/11 88/16 88/21 89/1 89/10 90/2 99/23 complaints [14] 15/25 29/15 30/23 37/12 39/3 39/7 39/14 51/1 72/18 81/4 86/24 102/3 130/7 131/20 complex [1] 105/16 compromises [1] 104/5 concept [1] 68/1 concern [14] 19/11 24/23 24/23 34/20 34/20 35/6 35/25 49/7 50/20 50/21 84/13 99/22 101/24 104/6 concerned [2] 71/15 101/25 concerning [1] 53/16 concerns [9] 13/10 30/10 31/12 35/22 87/25 94/6 94/12 102/3 123/23 concluded [3] 79/23 110/16 111/25 conclusion [1] 52/15 conditions [1] 32/9 conduct [2] 79/12 106/6 conducted [3] 35/24 52/4 86/12 conducting [2] 110/5 117/7 confident [1] 47/20 confidential [1] 101/7 confidentiality [1] 90/12 Congratulations [2] 5/14 95/22 Connecticut [6] 8/23 9/22 10/4 10/7 10/10 10/13 consider [1] 82/12 considered [5] 27/2 32/8 56/6 56/7 87/21 consistency [1] 125/16 consistent [1] 79/10 contact [8] 14/22 14/22 42/17 42/20 44/9 44/14 53/24 53/25 contacted [1] 63/7 continue [1] 108/13 continued [2] 75/24 79/25 continues [1] 129/15 contract [14] 7/9 26/13 26/14 26/15 27/7 27/8 27/16 28/19 28/22 89/14 107/12 108/8 108/9 108/12 contracts [2] 128/19 128/20 control [1] 107/1 conversation [1] 51/25 conversations [7] 27/23 27/24 28/1 28/23 43/18 117/22 119/6 converse [2] 42/20 44/3 conversed [1] 62/3 conversing [1] 47/25 coordinate [5] 125/18 125/19 125/20 125/24 126/18</p>	<p>coordinated [1] 127/4 coordinator [2] 115/18 115/18 copy [2] 45/3 74/6 corner [1] 105/1 correct [55] 6/7 12/25 13/5 19/23 21/3 24/8 24/12 26/1 27/10 29/15 31/5 33/7 36/25 38/3 41/6 41/10 41/13 41/15 46/2 49/15 51/2 56/20 61/17 62/18 63/19 68/11 68/20 69/3 69/3 69/9 76/14 78/24 86/6 90/16 90/25 91/14 91/18 92/16 92/20 93/18 96/5 97/22 104/24 105/3 108/17 108/21 109/8 109/20 116/5 120/25 121/22 124/5 126/23 128/8 128/9 correction [1] 124/19 corrective [4] 13/13 73/12 113/5 126/10 correspondence [1] 4/6 could [21] 5/5 12/4 26/21 29/10 30/1 32/20 43/2 43/22 48/4 56/21 56/23 56/23 58/23 67/1 67/5 74/9 77/10 78/23 90/12 104/9 110/24 couldn't [1] 130/18 counsel [3] 3/1 43/3 132/14 counseled [3] 54/25 64/2 64/13 counseling [4] 54/20 71/12 129/5 129/12 counselings [1] 129/7 COUNTY [5] 1/7 1/13 1/20 8/21 132/3 couple [2] 10/2 95/15 course [3] 92/18 92/23 104/4 court [13] 1/1 7/18 7/20 18/8 42/11 43/22 74/6 84/18 86/21 107/9 132/6 132/19 132/20 Courthouse [1] 3/22 covered [1] 30/16 create [1] 116/16 created [1] 105/22 creates [1] 121/8 Creek [5] 20/18 46/9 68/20 68/23 75/21 cultural [4] 14/5 94/11 123/1 123/6 culturally [1] 123/23 culture [1] 122/12 current [7] 35/12 60/6 61/12 61/16 61/22 62/1 62/21 cut [3] 45/16 58/16 64/22 cut-off [1] 45/16 CV [1] 1/5 cycle [1] 121/9 cyclical [1] 121/9</p> <hr/> <p>D</p> <p>D-E-N-E-T-R-A [1] 18/9 daily [2] 15/11 66/15 DAMON [5] 1/17 3/15 23/15 80/19 95/23 data [3] 75/23 123/17 126/7 date [5] 45/16 47/15 60/4 88/3 89/8 dated [1] 84/16 DAVIDSON [5] 1/7 1/13 1/20 8/21 132/3 day [2] 14/5 14/5 days' [1] 117/13 DCS [1] 126/18 deal [2] 85/23 116/17 dealing [4] 38/7 74/14 96/22 98/4 Deborah [1] 111/17 December [1] 6/5 December 6th [1] 6/5 decent [1] 122/17 decided [1] 114/24</p>
---	---	---

D	79/17 81/2 94/10 97/12 98/13 123/16 123/20 129/20 130/6 differently [2] 78/24 82/8 digital [1] 60/18 direct [3] 11/8 62/6 126/2 directed [1] 105/14 direction [1] 107/18 directly [4] 54/2 107/22 111/4 114/3 director [43] 7/25 8/8 9/17 11/7 11/13 11/14 11/16 11/20 13/7 13/17 16/22 19/8 19/19 26/16 28/5 30/20 33/12 33/18 34/3 34/17 55/7 55/19 60/15 62/5 63/10 63/15 64/20 72/22 72/24 73/2 80/13 80/15 81/6 86/8 86/19 103/10 104/12 112/15 112/24 113/16 116/15 118/1 126/9 director's [2] 79/19 80/21 directors [3] 66/14 78/2 113/24 disabilities [1] 9/21 disciplinary [4] 13/13 41/14 113/5 126/11 discipline [22] 15/4 19/9 20/20 112/10 112/13 112/15 112/17 112/19 114/20 114/24 116/2 116/17 117/16 117/20 117/22 118/4 118/10 118/16 125/10 125/11 125/12 127/12 disciplined [9] 31/20 32/5 55/1 64/1 64/13 111/13 113/19 115/3 124/12 disciplining [1] 54/20 discourage [1] 121/24 discouraged [1] 121/14 discover [1] 34/12 discovered [1] 33/23 discretion [1] 26/16 discrimination [35] 6/14 6/16 6/17 7/7 12/7 12/16 14/3 14/8 14/13 17/4 17/9 17/12 17/25 23/1 23/5 23/17 30/15 41/10 49/16 81/13 81/18 81/20 82/13 86/24 87/9 88/2 88/21 89/10 90/19 92/4 93/9 94/9 97/4 116/25 129/22 discriminatory [4] 49/14 49/20 50/6 50/15 discuss [6] 18/21 25/12 51/19 51/21 59/9 76/17 discussed [4] 74/14 83/14 113/18 129/18 discussing [1] 25/10 discussion [1] 25/15 discussions [1] 11/21 displacements [2] 59/20 61/3 dispute [1] 60/16 district [37] 1/1 1/1 7/5 7/9 7/10 8/3 8/14 8/17 12/7 27/5 27/15 33/25 34/1 37/14 38/24 58/25 59/7 65/18 65/20 65/25 66/18 66/24 67/7 76/14 77/25 79/10 94/24 96/5 96/18 97/5 97/14 97/15 101/20 120/5 125/17 131/4 131/5 district's [3] 41/19 41/25 75/5 division [3] 1/2 98/24 115/14 do [228] doctor [1] 111/22 document [15] 39/21 48/7 59/18 73/23 73/25 74/18 84/17 84/23 85/5 105/8 109/15 109/18 110/2 116/17 129/13 documentation [17] 53/6 72/20 73/6 73/9 73/14 73/17 77/15 77/17 77/25 118/17 125/13 126/7 126/14 127/23 128/10 128/16 128/17 documented [1] 74/3	documents [10] 8/1 43/6 76/9 77/18 77/22 114/5 114/19 117/19 126/12 129/2 DOE [33] 1/3 3/9 49/24 50/1 50/4 50/10 50/13 50/16 50/17 50/24 52/25 54/18 55/18 56/4 57/2 57/2 57/8 57/12 57/21 58/1 58/18 58/24 59/6 60/13 61/19 62/5 62/10 62/23 63/21 64/17 64/18 65/9 67/6 Doe's [10] 51/21 52/20 53/16 54/4 54/14 55/2 55/7 58/11 64/14 65/12 does [27] 21/2 23/25 27/18 28/16 30/6 30/22 46/2 47/5 47/10 57/14 57/25 59/7 68/4 73/21 75/4 75/8 75/11 75/13 97/23 98/22 101/13 105/5 108/4 115/12 121/24 125/10 125/15 doesn't [15] 15/6 31/1 32/13 54/11 63/24 63/24 73/18 81/21 89/16 99/20 106/23 114/9 116/19 116/21 129/25 doing [8] 13/5 32/1 32/13 71/16 94/3 104/11 121/25 130/11 don't [165] done [13] 12/24 13/1 13/3 19/10 24/15 25/16 34/2 45/19 62/4 64/4 67/20 94/11 110/15 Donna [2] 5/17 6/7 dose [1] 124/19 down [3] 9/22 13/6 106/20 dozen [1] 6/13 DR [117] 1/7 1/9 1/13 1/16 1/16 1/17 1/21 3/8 3/8 3/9 3/15 4/8 4/12 4/12 15/1 15/3 15/20 16/1 19/7 19/17 19/18 20/6 20/19 20/24 21/16 21/17 21/22 22/7 23/17 25/3 28/18 28/19 28/24 31/25 33/8 33/11 33/21 35/2 35/3 35/7 35/24 36/3 39/8 39/9 39/12 39/13 41/8 41/10 41/18 41/24 42/6 42/21 44/7 44/8 46/7 53/24 53/25 54/2 54/3 74/2 76/4 76/13 80/19 81/4 81/4 81/5 81/5 81/12 82/5 82/10 83/8 83/18 84/7 84/8 85/12 85/21 86/14 93/16 95/22 95/24 102/25 103/2 105/15 106/9 106/14 106/17 107/12 107/22 108/12 109/10 112/16 112/24 113/8 113/18 113/18 113/22 113/24 114/3 114/10 114/11 114/11 114/13 114/16 114/24 115/1 115/8 116/9 116/12 120/14 120/14 120/17 125/13 125/25 126/21 127/4 127/9 130/25 Dr. [74] 15/7 19/5 19/20 20/18 21/22 22/5 22/10 22/11 22/18 24/5 24/19 25/2 25/8 25/13 25/17 25/20 25/23 26/2 28/20 28/22 31/19 32/22 32/24 33/1 36/20 36/23 37/8 38/19 38/23 39/8 41/5 42/7 42/10 47/15 68/17 69/7 69/20 70/14 73/15 75/2 75/4 75/20 77/6 77/10 82/20 83/7 83/9 83/20 83/23 84/5 84/8 84/14 84/15 84/20 84/21 85/12 85/22 89/1 89/15 89/25 93/17 104/19 107/18 112/5 112/22 113/19 117/7 120/4 120/4 126/25 128/11 130/17 130/21 131/20 Dr. Bailey [33] 15/7 19/5 19/20 20/18 21/22 22/10 22/11 22/18 24/5 24/19 25/13 25/17 25/20 31/19 32/24 33/1 41/5 42/7 42/10 47/15 68/17 69/20 70/14 73/15 75/2 75/4 75/20 77/6 84/21 85/12 85/22 89/15 128/11 Dr. Bailey's [8] 22/5 25/23 26/2 28/22 32/22 69/7 84/20 126/25
---	---	--

<p>D</p> <p>Dr. Barnes [11] 25/2 25/8 82/20 83/7 83/9 83/20 83/23 84/5 84/8 84/14 84/15</p> <p>Dr. Braden [7] 36/20 36/23 39/8 120/4 130/17 130/21 131/20</p> <p>Dr. Braden's [2] 37/8 38/23</p> <p>Dr. Bradens [1] 120/4</p> <p>Dr. Changas' [1] 117/7</p> <p>Dr. Joseph [2] 89/25 93/17</p> <p>Dr. Majors [1] 112/22</p> <p>Dr. Mells [1] 77/10</p> <p>Dr. Michael [1] 104/19</p> <p>Dr. Sam [1] 38/19</p> <p>Dr. Sharon [2] 28/20 89/1</p> <p>Dr. Steele [2] 112/5 113/19</p> <p>Dr. Steele's [1] 107/18</p> <p>draft [2] 105/8 114/5</p> <p>drafting [1] 114/19</p> <p>Drive [2] 5/17 6/7</p> <p>dropped [1] 56/17</p> <p>due [13] 16/20 17/11 17/12 17/17 17/24 30/9 41/19 41/25 63/22 63/23 75/5 76/22 113/9</p> <p>duly [2] 5/2 132/18</p> <p>during [2] 92/23 101/2</p> <p>duties [2] 28/17 38/7</p> <p>duty [16] 20/3 24/1 24/7 24/10 27/19 28/13 54/20 57/15 58/1 59/7 63/3 63/4 82/23 83/1 86/23 118/7</p>	<p>59/7 61/12 63/11 66/7 67/18 73/11 82/25 86/8 86/20 94/16 94/22 97/12 97/12 98/12 102/8 108/15 115/8 117/25 128/13 129/6 129/8 129/19 129/22 130/1 132/14</p> <p>employee's [2] 33/24 61/12</p> <p>employees [25] 12/14 14/7 14/11 16/19 18/3 18/5 21/2 28/8 44/15 45/11 47/6 52/9 65/20 66/5 69/1 71/12 87/24 94/12 94/21 95/2 98/16 117/12 118/22 118/22 130/17</p> <p>employment [3] 7/6 32/7 32/10</p> <p>enable [1] 98/10</p> <p>encountered [3] 96/15 96/16 100/24</p> <p>encourage [3] 73/25 119/15 121/11</p> <p>encouraged [1] 112/2</p> <p>end [12] 7/1 8/15 38/1 38/6 62/17 70/22 70/25 87/19 88/4 88/15 88/22 89/7</p> <p>ended [4] 80/3 80/10 105/18 116/1</p> <p>enforcement [1] 126/19</p> <p>engaged [3] 36/23 87/20 95/3</p> <p>engaging [2] 28/6 87/8</p> <p>enough [3] 65/5 98/17 117/21</p> <p>ensure [4] 13/11 73/5 90/11 122/6</p> <p>entered [1] 95/9</p> <p>entire [1] 94/24</p> <p>entitled [2] 61/1 65/3</p> <p>environment [20] 12/1 21/7 21/14 34/2 34/16 90/18 92/5 94/8 94/15 94/18 94/22 96/22 96/24 101/10 101/12 118/19 118/20 121/8 121/10 121/20</p> <p>equal [1] 26/23</p> <p>equipped [1] 119/11</p> <p>et [5] 32/12 32/13 70/9 70/9 99/16</p> <p>ethnicity [1] 99/13</p> <p>evaluate [3] 70/11 73/19 112/22</p> <p>evaluated [1] 127/20</p> <p>even [12] 13/19 15/18 26/2 33/6 35/5 36/21 40/12 81/21 82/19 110/22 122/2 123/8</p> <p>Eventually [1] 72/12</p> <p>ever [18] 6/9 12/19 12/21 14/25 19/14 39/6 39/18 49/22 64/12 69/19 70/20 71/11 74/21 74/23 81/7 101/23 115/6 115/7</p> <p>every [3] 26/14 98/18 101/3</p> <p>everybody [1] 121/25</p> <p>everything [9] 12/5 13/11 21/15 46/20 70/10 97/15 100/22 106/16 127/3</p> <p>evidence [2] 13/20 125/21</p> <p>evidenced [1] 132/20</p> <p>exactly [16] 7/16 8/10 16/23 19/20 46/24 50/7 51/3 60/11 60/12 66/12 77/9 83/13 84/11 110/21 111/21 114/2</p> <p>Examination [6] 4/2 4/2 4/3 5/4 95/18 125/8</p> <p>example [2] 102/16 119/14</p> <p>except [1] 3/4</p> <p>Excuse [1] 80/6</p> <p>executive [19] 11/20 33/12 33/18 63/10 63/14 66/13 78/2 79/18 80/13 80/14 80/21 81/6 103/10 104/12 111/8 112/15 113/24 116/16 126/8</p> <p>exhibit [15] 43/8 44/20 44/23 48/4 48/8 74/8 74/16 74/16 74/19 84/20 84/24 85/3 85/7 109/24 110/3</p> <p>EXHIBITS [1] 4/5</p> <p>existed [3] 12/11 12/20 13/6</p> <p>existence [1] 60/9</p>	<p>expect [2] 28/4 125/15</p> <p>expecting [1] 68/13</p> <p>experience [4] 9/3 91/21 97/11 122/11</p> <p>expertise [1] 103/14</p> <p>expressed [1] 130/16</p> <p>extend [1] 117/14</p> <p>extra [1] 124/19</p>
<p>E</p> <p>e-mail [11] 4/6 4/8 41/1 41/4 41/23 42/24 45/5 45/7 45/9 46/7 84/3</p> <p>e-mails [6] 42/25 43/2 43/10 43/13 44/19 44/22</p> <p>each [2] 60/19 78/12</p> <p>earlier [2] 119/22 120/21</p> <p>early [3] 9/24 39/14 110/7</p> <p>ebbs [1] 98/5</p> <p>edgenuity [1] 108/15</p> <p>education [7] 9/25 35/11 49/18 109/7 115/13 115/16 116/12</p> <p>educational [1] 9/23</p> <p>EEOC [2] 82/7 86/25</p> <p>effect [1] 60/14</p> <p>effort [1] 107/14</p> <p>egregious [1] 117/21</p> <p>eight [1] 106/5</p> <p>either [8] 6/6 18/18 65/14 71/20 73/11 89/8 98/3 112/21</p> <p>electronic [2] 60/19 60/22</p> <p>elementary [1] 46/23</p> <p>eligibility [2] 128/2 128/2</p> <p>eligible [3] 128/4 128/6 128/7</p> <p>eliminate [1] 65/2</p> <p>eliminated [9] 55/8 64/21 75/9 75/10 75/16 75/18 111/3 111/7 111/16</p> <p>ELLEN [8] 1/24 3/1 5/1 5/7 5/8 105/2 133/4 133/22</p> <p>else [25] 16/14 22/19 22/25 23/21 31/2 33/15 36/4 36/6 40/22 44/18 45/7 52/2 54/21 71/24 72/25 77/2 80/20 85/22 89/4 101/1 103/23 110/20 115/15 116/7 118/3</p> <p>empathize [2] 65/6 65/9</p> <p>employee [49] 4/10 7/25 8/8 11/16 13/7 13/16 14/2 16/22 17/24 18/13 23/23 28/5 29/13 31/3 31/6 31/11 34/3 34/14 34/15 34/16 47/1 55/1 57/16 57/19</p>	<p>equal [1] 26/23</p> <p>equipped [1] 119/11</p> <p>et [5] 32/12 32/13 70/9 70/9 99/16</p> <p>ethnicity [1] 99/13</p> <p>evaluate [3] 70/11 73/19 112/22</p> <p>evaluated [1] 127/20</p> <p>even [12] 13/19 15/18 26/2 33/6 35/5 36/21 40/12 81/21 82/19 110/22 122/2 123/8</p> <p>Eventually [1] 72/12</p> <p>ever [18] 6/9 12/19 12/21 14/25 19/14 39/6 39/18 49/22 64/12 69/19 70/20 71/11 74/21 74/23 81/7 101/23 115/6 115/7</p> <p>every [3] 26/14 98/18 101/3</p> <p>everybody [1] 121/25</p> <p>everything [9] 12/5 13/11 21/15 46/20 70/10 97/15 100/22 106/16 127/3</p> <p>evidence [2] 13/20 125/21</p> <p>evidenced [1] 132/20</p> <p>exactly [16] 7/16 8/10 16/23 19/20 46/24 50/7 51/3 60/11 60/12 66/12 77/9 83/13 84/11 110/21 111/21 114/2</p> <p>Examination [6] 4/2 4/2 4/3 5/4 95/18 125/8</p> <p>example [2] 102/16 119/14</p> <p>except [1] 3/4</p> <p>Excuse [1] 80/6</p> <p>executive [19] 11/20 33/12 33/18 63/10 63/14 66/13 78/2 79/18 80/13 80/14 80/21 81/6 103/10 104/12 111/8 112/15 113/24 116/16 126/8</p> <p>exhibit [15] 43/8 44/20 44/23 48/4 48/8 74/8 74/16 74/16 74/19 84/20 84/24 85/3 85/7 109/24 110/3</p> <p>EXHIBITS [1] 4/5</p> <p>existed [3] 12/11 12/20 13/6</p> <p>existence [1] 60/9</p>	<p>F</p> <p>face [2] 53/11 53/11</p> <p>facets [1] 97/12</p> <p>facilitate [4] 66/6 117/16 118/11 118/14</p> <p>facilitator [2] 126/3 126/5</p> <p>fact [7] 18/25 19/17 91/25 92/2 97/1 106/4 114/16</p> <p>fact-finding [1] 106/4</p> <p>factors [2] 32/7 125/16</p> <p>facts [2] 121/1 123/10</p> <p>factual [2] 90/8 91/11</p> <p>fair [2] 37/7 121/16</p> <p>fair-minded [1] 121/16</p> <p>fall [4] 28/16 30/4 30/7 116/11</p> <p>falsification [6] 102/19 104/14 104/16 106/7 115/9 116/4</p> <p>falsifications [1] 116/9</p> <p>falsified [1] 103/5</p> <p>falsifying [1] 102/17</p> <p>falsity [1] 120/1</p> <p>familiar [4] 50/22 97/14 105/5 108/25</p> <p>family [1] 9/25</p> <p>famine [1] 98/2</p> <p>far [1] 100/9</p> <p>farmed [1] 81/2</p> <p>fault [1] 103/5</p> <p>favorite [2] 106/22 107/2</p> <p>fear [49] 12/11 12/20 12/25 13/6 13/17 14/13 18/18 19/1 19/18 20/19 24/16 24/19 25/13 25/24 26/3 29/1 29/6 40/10 40/17 40/24 67/19 68/1 68/2 69/14 69/25 70/15 85/10 85/20 86/15 86/15 89/18 89/21 90/1 91/4 91/14 91/22 92/3 92/11 92/19 93/18 93/23 94/16 94/22 102/19 104/4 120/22 121/6 121/23 122/4</p> <p>feared [5] 85/23 91/16 92/24 93/11 102/9</p> <p>feast [1] 98/2</p> <p>federal [3] 3/2 7/18 7/22</p> <p>feel [4] 65/3 65/4 98/18 130/8</p> <p>feeling [1] 121/3</p> <p>felt [7] 31/13 50/5 51/5 91/19 120/6 121/15 130/19</p> <p>few [1] 100/21</p> <p>fewer [1] 106/5</p> <p>field [1] 101/21</p> <p>file [20] 25/23 26/1 32/23 68/8 88/11 88/16 101/17 101/17 116/14 128/14 129/6 129/8 129/9 129/10 129/14 129/19 129/23 129/25 130/1 130/4</p> <p>filed [19] 4/6 8/7 16/16 16/21 22/15 37/10 37/12 37/17 43/7 48/24 49/2 55/17 55/23 56/3 57/9 82/7 86/24 89/9 102/3</p> <p>files [4] 15/10 16/13 51/14 101/16</p> <p>filing [2] 7/4 88/25</p> <p>financial [1] 123/18</p> <p>financially [1] 132/15</p> <p>find [12] 6/6 15/11 42/6 42/10 42/18 47/5 61/25 71/10 72/14 73/20 77/19 99/23</p>

<p>F</p> <p>finding [1] 106/4 findings [6] 36/14 39/10 42/22 47/21 110/14 126/15 fine [2] 40/5 59/14 finishing [1] 36/21 fire [1] 97/8 firm [1] 110/5 first [8] 5/2 37/18 59/24 74/13 100/5 100/7 100/10 111/23 five [2] 59/13 95/23 fix [1] 121/12 flaws [1] 33/16 flows [1] 98/5 focus [1] 90/20 fodder [2] 101/24 102/1 folks [3] 23/18 37/11 127/22 follow [5] 42/19 48/3 64/2 106/1 109/5 follow-up [1] 48/3 followed [1] 66/3 following [2] 132/21 133/5 follows [1] 5/3 Ford [1] 3/16 foregoing [2] 132/9 133/4 forgive [1] 99/19 form [49] 3/4 4/15 13/8 13/23 21/19 21/24 22/21 23/11 24/21 25/4 25/18 28/2 32/2 34/4 35/20 37/1 39/17 40/11 40/18 48/17 55/5 59/1 64/24 67/8 68/7 69/10 70/3 71/14 72/15 80/7 81/8 85/15 85/25 87/11 90/3 93/20 95/4 95/11 96/6 104/23 105/6 105/19 105/21 105/24 120/2 123/12 129/14 131/1 131/12 formal [1] 41/9 formalities [1] 3/3 formed [1] 99/2 former [3] 65/17 65/19 105/23 forms [2] 90/18 94/8 forth [7] 39/3 43/14 43/18 43/18 44/19 44/22 114/7 forward [1] 122/6 foster [2] 90/17 94/8 found [2] 21/9 35/1 four [2] 18/6 29/25 fourth [1] 41/23 Fox [1] 3/21 frame [1] 44/24 Frank [2] 11/9 18/10 free [2] 90/18 94/8 frequent [3] 104/1 118/8 118/9 frequently [2] 55/16 92/25 Frogge [1] 35/17 front [4] 49/22 119/5 120/24 123/10 full [1] 5/5 function [1] 116/22 functions [1] 116/23 funds [1] 31/21 further [3] 131/25 132/13 132/18 future [2] 5/25 6/3</p>	<p>George [1] 6/25 get [16] 10/12 14/4 19/8 26/24 65/10 66/9 74/6 97/9 98/3 101/15 102/25 103/4 105/10 107/13 115/12 119/5 getting [3] 5/9 47/14 130/6 give [9] 16/23 31/8 40/16 42/20 53/11 90/13 102/16 119/10 121/1 given [6] 6/9 14/21 42/6 82/17 122/25 125/10 Gloria [3] 65/13 65/17 66/23 go [29] 11/10 17/3 21/13 22/14 24/5 30/21 33/2 36/8 42/22 44/9 45/12 46/17 49/22 52/8 52/9 59/24 63/10 67/15 73/22 82/3 100/4 107/1 112/23 116/18 121/2 121/4 124/2 127/17 129/25 goes [5] 27/24 99/15 114/4 114/7 130/3 going [59] 10/1 12/1 12/5 15/2 19/6 19/22 19/25 20/1 20/2 20/4 20/19 22/9 23/24 27/17 27/21 28/8 36/13 36/17 43/13 43/17 43/18 44/19 44/22 45/22 49/24 56/22 56/24 59/17 59/17 60/25 62/17 71/10 72/5 72/25 74/6 74/15 77/2 78/3 79/12 88/2 96/18 98/23 100/6 100/16 100/22 101/2 103/18 104/14 106/20 108/16 111/22 112/5 117/24 118/25 120/9 120/19 121/7 121/11 122/15 gone [3] 19/5 82/1 106/16 good [3] 46/22 94/15 119/17 got [21] 5/8 10/21 11/23 11/24 37/18 45/5 48/2 74/12 77/5 87/17 88/3 88/15 88/22 96/9 96/14 99/6 99/20 101/5 105/13 105/17 107/9 gotcha [1] 118/19 gotten [1] 98/7 GOVERNMENT [3] 1/6 1/12 1/19 grade [9] 39/16 56/12 56/16 56/25 104/14 104/15 106/7 115/8 116/8 grades [10] 56/13 56/18 102/18 102/19 103/5 103/6 103/9 107/13 116/1 116/5 grading [1] 108/13 grateful [1] 98/8 greater [1] 56/18 grievance [7] 55/17 57/6 57/8 57/9 64/8 118/5 118/5 Grievances [1] 118/8 Griffin [3] 28/21 76/4 76/13 gross [1] 36/23 grounds [1] 20/23 group [4] 42/2 90/20 99/1 103/12 guarantee [2] 27/6 101/9 guaranteed [2] 27/5 27/14 guidance [3] 19/13 77/16 109/2 guide [1] 98/12 guided [1] 79/8 guilty [2] 39/15 131/11</p>	<p>131/10 131/17 Half [1] 6/13 hand [5] 39/21 74/5 84/16 116/18 116/18 handbook [7] 4/10 56/19 60/2 60/3 60/6 60/18 74/13 handle [13] 15/22 19/13 46/3 57/5 57/7 57/7 58/5 65/22 101/13 104/2 112/11 119/11 119/12 handled [13] 9/9 28/11 30/13 52/22 56/3 65/19 82/7 87/1 103/9 112/10 118/4 127/7 127/10 handling [1] 52/17 happen [5] 33/15 68/15 111/5 111/5 112/22 happened [8] 36/12 42/18 58/11 68/16 68/18 108/5 111/11 111/21 happening [6] 36/19 37/18 100/10 100/15 100/18 102/12 happens [5] 14/23 20/14 20/21 21/10 68/11 harassed [3] 17/21 124/22 124/23 harasser [1] 16/6 harassment [21] 11/5 14/3 14/8 14/13 16/7 17/4 17/17 30/15 36/9 36/24 37/9 49/16 82/13 90/19 94/9 97/4 99/13 99/14 116/25 124/25 129/22 Harbison [6] 3/16 3/17 4/2 59/17 95/18 96/1 hard [5] 65/5 106/1 107/10 121/2 124/6 has [35] 13/4 20/18 22/19 22/25 34/10 34/15 35/3 37/13 45/2 47/1 47/1 56/25 59/6 64/19 67/23 73/20 74/7 75/4 75/8 75/15 76/13 76/16 76/19 76/21 89/14 101/23 102/5 104/3 114/1 114/6 116/8 117/7 118/1 118/6 123/11 hasn't [1] 89/16 hate [1] 52/22 have [221] haven't [1] 122/8 having [10] 5/2 15/4 25/15 51/25 81/20 85/23 94/6 94/7 99/12 133/4 he [82] 7/4 7/4 7/9 7/10 7/11 7/12 7/12 7/14 7/16 8/4 8/4 8/7 8/24 11/23 18/15 20/18 20/20 22/5 22/5 22/15 26/3 29/1 29/2 29/6 31/19 33/6 36/12 36/20 38/1 38/2 38/15 38/16 38/17 38/20 38/20 38/22 39/2 39/15 39/16 41/12 41/16 41/17 42/19 43/11 43/19 44/3 44/5 44/14 44/16 46/10 46/10 46/13 47/20 68/19 69/22 69/23 69/24 69/25 70/1 70/14 70/15 70/16 71/2 71/2 71/3 83/15 85/22 86/13 103/10 106/10 108/13 108/15 113/9 113/13 114/24 115/3 130/23 130/24 131/4 131/8 131/11 131/11 head [3] 29/12 66/8 89/5 health [5] 76/16 76/19 76/22 76/23 77/4 healthy [2] 94/18 94/22 hear [12] 48/10 79/6 91/13 91/22 92/1 92/3 92/9 92/9 92/14 92/19 93/1 93/22 heard [10] 91/17 91/19 92/6 92/12 92/17 92/25 93/3 93/8 93/12 120/3 hearing [4] 3/4 86/12 91/11 94/1 heart [2] 77/2 102/1 hectic [6] 96/20 96/22 96/24 100/6 100/15 101/2 held [3] 124/13 124/13 124/23 help [7] 58/6 98/10 98/12 105/16 108/4 118/21 123/16</p>
<p>G</p> <p>Garcia [1] 33/21 GARLAND [3] 2/8 132/6 132/24 gathering [1] 125/20 gathers [1] 125/24 gave [2] 13/20 13/20 gender [1] 99/16 general [4] 30/12 94/23 96/9 121/3 generally [2] 65/22 93/1</p>	<p>H</p> <p>had [65] 8/13 10/20 12/15 19/5 19/18 19/22 20/6 20/11 22/15 23/16 25/1 26/3 29/1 29/2 30/3 34/1 36/1 36/20 36/23 37/8 37/21 42/18 42/21 43/17 43/19 44/19 51/4 55/24 56/5 58/24 60/14 61/20 61/20 62/4 63/2 68/19 69/25 70/15 74/2 77/1 81/23 84/12 90/4 95/2 97/6 97/16 97/18 100/20 100/23 103/1 103/2 107/12 108/1 109/2 112/10 112/11 114/18 115/6 115/7 115/15 116/8 120/5 120/8</p>	

<p>H</p> <p>her [55] 15/3 15/4 19/9 20/20 33/17 33/17 33/25 34/14 41/14 48/1 49/7 49/24 50/14 50/17 50/19 50/20 50/21 50/21 51/1 51/5 51/6 51/6 51/10 55/19 55/21 56/6 56/9 56/10 57/3 58/15 61/22 61/22 62/1 62/1 62/6 62/12 63/15 63/18 64/19 64/20 65/2 65/4 65/11 66/19 67/6 76/20 76/23 77/3 81/17 82/3 82/17 84/13 120/18 125/18 131/8</p> <p>here [14] 9/22 13/2 22/3 33/4 37/18 41/18 47/16 71/9 74/8 96/9 96/14 107/9 107/24 118/12</p> <p>Here's [1] 20/17</p> <p>hereby [2] 132/7 133/4</p> <p>hey [1] 57/21</p> <p>hierarchy [1] 39/11</p> <p>high [10] 39/16 46/22 80/9 80/12 80/14 95/1 95/8 98/3 104/17 112/9</p> <p>High's [1] 80/9</p> <p>higher [1] 18/24</p> <p>highest [1] 78/14</p> <p>highlighted [1] 107/25</p> <p>Hill [7] 5/17 6/7 65/13 65/17 66/23 66/25 67/3</p> <p>him [24] 20/20 24/8 37/3 42/19 42/20 42/23 43/11 43/18 43/19 44/3 44/10 46/8 68/22 73/16 74/3 83/11 83/12 103/8 113/12 114/25 115/2 130/18 130/22 130/23</p> <p>hire [4] 58/24 59/6 66/9 67/5</p> <p>hired [4] 79/8 79/9 80/12 95/7</p> <p>hiring [11] 58/3 62/3 63/9 65/23 66/1 66/10 66/12 66/16 127/7 127/8 129/2</p> <p>his [38] 8/2 8/3 8/13 8/14 11/19 11/20 20/20 22/5 22/6 24/16 25/13 29/2 29/6 29/6 36/14 38/13 38/22 39/3 41/8 41/13 44/5 46/8 68/19 68/21 68/23 70/1 70/16 75/5 75/21 75/24 80/13 86/13 86/14 86/15 86/15 108/17 113/14 128/13</p> <p>history [1] 131/2</p> <p>Holdings [2] 9/13 9/15</p> <p>Holmes [1] 1/7</p> <p>home [1] 5/16</p> <p>honest [3] 36/2 75/17 100/21</p> <p>hopefully [1] 106/4</p> <p>hostile [3] 34/1 34/15 92/5</p> <p>how [32] 5/10 5/18 6/12 9/6 9/14 16/10 16/19 17/10 18/3 18/5 19/13 28/5 28/7 42/23 64/17 64/18 64/23 70/6 70/17 104/2 105/10 105/13 105/17 112/13 113/18 115/3 121/25 122/1 122/2 122/8 122/23 124/8</p> <p>HR [24] 9/3 9/11 9/17 10/20 10/25 11/13 28/12 30/19 39/3 39/11 58/3 58/23 62/3 63/9 65/17 65/19 65/21 66/16 81/1 100/24 111/9 111/18 123/5 127/7</p> <p>hub [2] 91/1 91/2</p> <p>human [8] 9/8 19/12 24/23 30/1 67/15 110/6 110/10 111/19</p> <p>husband [1] 8/24</p> <p>hyphen [1] 18/11</p> <p>hypotheticals [1] 34/6</p> <p>I</p> <p>I'd [3] 44/20 84/19 109/23</p> <p>I'll [1] 74/10</p>	<p>I'm [54] 5/9 6/1 8/6 8/10 15/2 19/6 19/6 23/3 23/7 23/24 24/6 28/10 29/12 33/10 35/25 37/12 37/15 40/12 41/21 47/19 49/24 50/1 50/7 50/12 50/22 51/25 56/22 60/11 64/9 66/12 67/22 72/5 74/5 79/12 90/10 92/1 92/2 92/22 98/8 98/14 98/15 104/14 106/20 107/1 108/25 108/25 114/2 116/3 120/20 121/11 121/17 124/22 127/18 131/20</p> <p>I've [8] 6/20 17/14 68/18 79/9 85/1 98/8 101/11 121/13</p> <p>ID [1] 4/14</p> <p>idea [10] 23/9 43/1 44/13 47/16 61/23 62/8 76/25 77/4 80/15 99/6</p> <p>identification [2] 85/3 85/6</p> <p>identified [2] 33/16 54/24</p> <p>identity [1] 99/16</p> <p>illegal [4] 102/13 102/13 103/17 103/21</p> <p>imagine [1] 43/1</p> <p>immediately [1] 20/9</p> <p>impact [3] 41/20 41/25 75/6</p> <p>impacted [3] 70/24 111/2 130/12</p> <p>implied [1] 92/10</p> <p>important [2] 119/4 119/4</p> <p>impower [1] 98/11</p> <p>inaccurate [1] 56/11</p> <p>inaccurately [1] 103/6</p> <p>incident [1] 100/2</p> <p>incidents [1] 98/3</p> <p>include [3] 97/19 97/23 125/11</p> <p>includes [3] 31/18 126/22 127/12</p> <p>including [1] 109/6</p> <p>inconsistencies [1] 79/13</p> <p>inconsistency [1] 81/14</p> <p>inconsistent [2] 79/14 79/16</p> <p>INDEX [1] 3/25</p> <p>individual [13] 14/21 15/11 15/18 16/5 34/21 59/4 61/16 70/8 72/4 79/9 89/2 128/22 128/23</p> <p>individuals [22] 15/20 17/10 22/9 22/12 28/6 28/10 36/24 40/9 40/16 52/25 58/23 65/14 67/5 69/15 79/24 81/10 82/14 106/9 116/2 119/16 127/24 131/16</p> <p>inferences [1] 49/7</p> <p>inferred [1] 130/20</p> <p>inflated [1] 103/6</p> <p>information [22] 14/22 30/10 42/21 43/17 44/10 44/14 72/1 75/23 76/6 80/5 80/11 83/5 90/9 101/4 101/6 101/16 106/2 112/18 114/15 125/13 125/24 130/13</p> <p>informed [5] 58/22 58/23 59/4 59/5 67/5</p> <p>infractions [3] 115/10 115/16 115/22</p> <p>initiate [1] 116/14</p> <p>initiated [1] 73/12</p> <p>injury [1] 118/6</p> <p>input [1] 115/3</p> <p>inquiring [1] 20/3</p> <p>instance [3] 15/1 80/19 89/24</p> <p>instinctually [1] 102/2</p> <p>instituted [1] 122/24</p> <p>instruction [1] 58/6</p> <p>integrity [1] 104/5</p> <p>interact [2] 66/15 114/3</p> <p>interacting [1] 92/8</p> <p>interaction [4] 15/19 21/8 70/9 77/10</p> <p>interactive [1] 117/22</p> <p>interest [1] 38/5</p>	<p>interested [1] 132/15</p> <p>interfere [3] 71/25 72/7 72/8</p> <p>interim [3] 11/7 11/8 11/14</p> <p>interview [11] 12/2 43/11 52/10 52/11 53/11 78/19 79/3 79/5 96/3 96/8 99/22</p> <p>interviewed [9] 43/19 53/6 53/8 53/15 78/9 80/20 93/1 106/9 106/10</p> <p>interviewers [5] 78/19 78/23 79/4 79/15 79/17</p> <p>interviews [6] 52/13 78/12 78/18 79/12 79/23 79/25</p> <p>intimately [5] 34/25 50/22 64/9 65/10 108/25</p> <p>intimidate [1] 108/16</p> <p>inundated [1] 97/9</p> <p>investigate [26] 14/8 32/21 33/14 49/12 53/1 53/19 63/24 68/15 72/3 77/24 81/25 82/22 82/23 83/2 84/14 88/6 88/9 88/12 98/18 102/15 102/21 117/4 122/22 123/9 123/14 125/9</p> <p>investigated [13] 15/14 32/24 38/9 47/17 47/20 49/10 53/5 53/21 54/5 54/11 54/12 54/19 81/7</p> <p>investigating [12] 29/14 38/8 54/14 54/22 55/2 63/3 64/14 72/17 86/23 97/3 116/24 126/20</p> <p>investigation [45] 14/14 14/16 36/15 36/20 36/22 39/6 42/15 42/18 47/18 47/21 51/15 52/4 52/7 52/9 52/17 52/23 69/8 69/12 77/19 82/20 92/8 92/18 92/23 100/12 106/6 106/15 107/12 109/19 110/6 110/10 110/16 111/11 111/14 111/25 117/5 117/5 117/6 124/18 126/15 127/3 128/24 129/18 129/21 129/24 131/16</p> <p>investigations [5] 97/11 99/4 105/20 110/12 118/4</p> <p>investigative [8] 4/15 25/23 101/15 101/17 104/23 105/6 105/20 129/25</p> <p>investigator [4] 15/23 81/2 82/6 112/7</p> <p>investigators [8] 77/23 97/7 97/18 98/16 98/17 98/25 100/8 124/5</p> <p>involve [4] 36/6 72/4 103/12 104/19</p> <p>involved [26] 6/18 14/4 23/14 29/9 32/7 34/24 34/25 35/2 36/3 36/4 36/19 42/8 55/16 64/9 65/11 70/17 73/19 86/1 92/24 102/25 112/13 114/1 121/15 127/6 127/25 128/24</p> <p>involved Dr [1] 36/3</p> <p>involvement [1] 96/20</p> <p>involves [2] 66/13 130/10</p> <p>involving [3] 6/21 15/20 50/18</p> <p>IPP [2] 129/4 129/18</p> <p>IPPs [1] 128/22</p> <p>is [190]</p> <p>isn't [3] 14/2 46/19 100/8</p> <p>issue [13] 6/6 7/5 15/20 36/17 54/9 93/6 99/20 100/3 100/25 105/11 112/5 112/6 125/22</p> <p>issues [27] 12/3 14/4 14/5 25/8 30/16 54/24 56/4 74/1 74/3 76/16 76/19 76/22 77/4 90/21 96/19 97/4 98/5 98/10 98/12 98/21 99/4 103/4 125/1 126/13 127/22 128/20 129/5</p> <p>it [339]</p> <p>it's [101] 5/8 7/22 13/13 15/17 16/23 16/25 18/22 18/23 20/13 21/6 21/10 26/14 26/20 27/1 31/7 41/4 41/13 41/16 41/23 46/19 46/20 47/7 50/23 53/11 53/12 54/19 55/15 56/12 56/16</p>
--	---	--

I	53/1 kin [1] 33/21 kind [13] 7/5 11/6 102/5 104/4 106/3 107/21 114/6 114/23 123/6 125/16 126/18 128/25 129/2 Klein [12] 4/6 42/11 42/12 42/13 42/17 43/10 43/14 44/20 44/23 45/6 47/19 53/1 knew [12] 8/13 19/24 20/2 22/8 22/14 23/18 86/3 92/2 120/7 130/17 130/23 130/23 know [249] knowing [1] 130/11 knowledge [19] 13/4 19/22 24/18 33/5 67/9 80/16 90/5 90/8 90/9 90/10 90/24 91/3 91/6 91/8 97/10 119/9 119/10 119/25 132/10 known [2] 15/17 67/11	level [19] 14/20 46/21 57/6 57/7 57/9 57/11 58/2 98/3 103/10 112/19 113/5 117/4 117/5 117/20 117/21 117/24 118/5 118/5 119/12 levels [1] 126/10 liaison [1] 18/14 liberty [1] 76/17 license [5] 10/6 10/9 10/12 47/9 47/11 licensed [3] 132/6 132/18 132/19 Licensure [1] 115/14 lieu [2] 7/12 36/13 like [52] 10/19 14/20 15/9 16/25 18/24 20/5 28/22 29/8 31/10 37/17 37/25 44/16 44/20 45/19 54/18 60/19 64/6 66/14 67/17 70/9 72/19 74/11 77/22 81/1 83/19 84/19 85/17 90/16 90/19 92/6 92/12 93/7 93/7 97/8 98/18 98/20 100/14 100/23 101/3 101/10 107/5 109/23 111/6 111/15 116/1 118/6 118/12 118/13 123/9 123/24 124/11 128/25 likelihood [1] 62/17 likely [1] 125/19 LILY [5] 1/9 3/8 23/15 33/21 80/19 limit [4] 17/9 55/13 56/9 115/25 limited [1] 21/12 Lindsay [6] 11/15 11/19 11/22 12/13 12/18 13/18 LINE [1] 133/7 Lisa [2] 63/15 63/17 list [3] 88/6 88/7 99/15 listen [2] 93/2 93/5 little [6] 8/20 30/22 67/25 97/17 105/12 122/10 lived [1] 5/18 lives [1] 130/12 LLC [1] 3/11 local [1] 7/21 location [1] 26/23 logical [3] 45/19 45/22 116/18 logically [1] 123/4 long [5] 5/18 107/3 120/5 131/4 131/5 longer [6] 38/24 65/18 65/20 66/17 66/23 77/7 longevity [1] 58/16 look [24] 22/15 29/20 29/22 30/3 33/2 40/4 62/14 64/5 64/6 64/7 67/22 68/16 72/18 72/20 88/11 104/12 105/5 118/17 118/23 120/9 121/2 124/20 125/12 125/16 looked [9] 20/24 30/9 30/11 63/5 76/9 77/6 81/21 120/6 128/13 looking [2] 121/14 121/17 lost [15] 22/5 29/2 29/6 37/9 37/12 37/21 55/18 55/20 55/24 68/19 70/1 70/16 75/4 75/21 128/8 lot [13] 17/7 38/2 38/4 65/23 96/17 96/19 98/4 99/12 100/6 100/17 100/23 130/6 130/10 lower [4] 27/1 27/1 62/11 63/2 loyalty [4] 33/24 34/13 34/19 34/22
J	L L-A-R-C [1] 9/20 lapsed [1] 10/21 Larc [1] 9/20 last [9] 5/10 5/11 6/23 7/21 8/8 35/25 60/10 95/19 115/19 late [4] 4/6 43/7 110/7 122/9 Late-filed [2] 4/6 43/7 later [3] 45/1 45/2 48/18 law [6] 3/11 3/17 3/17 3/22 110/5 126/19 lawful [1] 124/10 lawsuit [5] 8/7 22/4 58/25 59/6 67/6 lawsuits [1] 37/10 LCR [3] 132/6 132/20 132/24 Lead [1] 1/7 leader [3] 99/25 100/1 117/23 leaders [6] 70/13 73/25 98/11 98/13 118/14 118/21 leadership [8] 14/20 21/8 49/12 75/24 99/24 106/16 117/23 119/5 leading [1] 126/14 learn [2] 48/22 96/21 learned [5] 48/18 76/7 76/8 97/8 97/9 leasing [1] 5/22 least [2] 6/13 17/18 leave [18] 15/13 16/4 16/6 16/20 17/3 17/6 17/8 17/11 17/17 17/24 117/3 117/9 117/10 117/13 117/13 118/11 118/16 129/1 leaves [1] 117/2 leaving [1] 6/2 led [3] 106/10 107/22 107/23 LEFFLER [6] 1/9 3/8 23/15 33/21 80/19 81/5 left [4] 37/14 37/14 37/16 76/13 leg [1] 28/12 legal [4] 18/14 82/8 87/1 109/5 legitimate [2] 124/14 124/15 less [1] 27/14 lesson [9] 48/11 48/14 49/5 50/5 50/14 51/1 51/4 51/6 64/19 lessons [2] 49/14 49/19 let [14] 33/20 36/8 39/21 46/17 59/24 74/5 84/16 90/14 98/14 102/7 107/24 108/1 111/23 114/25 let's [10] 30/21 43/24 48/10 50/5 51/1 64/18 85/2 97/17 122/9 122/10 letter [10] 4/12 4/14 74/9 74/23 81/17 84/4 84/5 84/21 113/14 128/25 letters [2] 8/2 72/19	like [52] 10/19 14/20 15/9 16/25 18/24 20/5 28/22 29/8 31/10 37/17 37/25 44/16 44/20 45/19 54/18 60/19 64/6 66/14 67/17 70/9 72/19 74/11 77/22 81/1 83/19 84/19 85/17 90/16 90/19 92/6 92/12 93/7 93/7 97/8 98/18 98/20 100/14 100/23 101/3 101/10 107/5 109/23 111/6 111/15 116/1 118/6 118/12 118/13 123/9 123/24 124/11 128/25 likelihood [1] 62/17 likely [1] 125/19 LILY [5] 1/9 3/8 23/15 33/21 80/19 limit [4] 17/9 55/13 56/9 115/25 limited [1] 21/12 Lindsay [6] 11/15 11/19 11/22 12/13 12/18 13/18 LINE [1] 133/7 Lisa [2] 63/15 63/17 list [3] 88/6 88/7 99/15 listen [2] 93/2 93/5 little [6] 8/20 30/22 67/25 97/17 105/12 122/10 lived [1] 5/18 lives [1] 130/12 LLC [1] 3/11 local [1] 7/21 location [1] 26/23 logical [3] 45/19 45/22 116/18 logically [1] 123/4 long [5] 5/18 107/3 120/5 131/4 131/5 longer [6] 38/24 65/18 65/20 66/17 66/23 77/7 longevity [1] 58/16 look [24] 22/15 29/20 29/22 30/3 33/2 40/4 62/14 64/5 64/6 64/7 67/22 68/16 72/18 72/20 88/11 104/12 105/5 118/17 118/23 120/9 121/2 124/20 125/12 125/16 looked [9] 20/24 30/9 30/11 63/5 76/9 77/6 81/21 120/6 128/13 looking [2] 121/14 121/17 lost [15] 22/5 29/2 29/6 37/9 37/12 37/21 55/18 55/20 55/24 68/19 70/1 70/16 75/4 75/21 128/8 lot [13] 17/7 38/2 38/4 65/23 96/17 96/19 98/4 99/12 100/6 100/17 100/23 130/6 130/10 lower [4] 27/1 27/1 62/11 63/2 loyalty [4] 33/24 34/13 34/19 34/22
K	M M-U-N-O-Z [1] 5/13 made [28] 16/8 18/24 18/25 19/1 20/5 22/19 22/25 23/4 23/13 28/21 33/1 33/6 33/9 46/15 61/15 61/19 61/21 61/25 62/20 65/2 80/6 81/5 99/3 100/15 101/2 112/17 115/1 131/10 Magistrate [1] 1/6	

<p>M</p> <p>maiden [1] 5/7</p> <p>mail [11] 4/6 4/8 41/1 41/4 41/23 42/24 45/5 45/7 45/9 46/7 84/3</p> <p>mails [6] 42/25 43/2 43/10 43/13 44/19 44/22</p> <p>maintain [1] 77/16</p> <p>Majors [3] 111/18 112/21 112/22</p> <p>make [23] 15/5 48/10 50/6 51/1 62/19 64/18 66/11 74/8 74/11 79/4 87/23 90/1 90/15 90/22 94/23 100/2 109/23 119/3 120/20 122/20 123/21 125/2 129/9</p> <p>makes [2] 63/21 113/16</p> <p>making [5] 63/4 88/21 107/7 113/25 126/9</p> <p>manager [14] 9/9 9/11 9/19 58/3 62/3 63/10 65/17 65/19 65/21 66/10 66/12 66/16 127/7 127/8</p> <p>managers [2] 18/14 127/7</p> <p>many [11] 6/12 16/19 16/24 17/10 18/3 18/5 37/7 37/19 100/8 122/1 122/2</p> <p>marked [9] 43/7 44/20 48/4 48/8 74/19 84/24 85/2 85/6 110/3</p> <p>market [3] 9/8 9/10 9/11</p> <p>married [1] 5/8</p> <p>MARY [8] 1/24 3/1 5/1 5/7 5/8 105/2 133/4 133/22</p> <p>massive [1] 61/20</p> <p>mastering [1] 107/15</p> <p>material [1] 107/15</p> <p>matter [7] 40/9 71/21 95/8 101/24 101/25 130/7 130/15</p> <p>Matthews [3] 18/11 18/11 18/15</p> <p>may [25] 1/24 3/2 23/4 44/16 44/21 54/12 63/10 70/22 71/1 74/9 77/1 77/1 77/2 80/20 83/13 84/20 99/18 99/22 109/2 110/19 121/19 121/21 122/14 129/7 131/3</p> <p>maybe [4] 18/23 45/24 46/21 112/16</p> <p>McAllester [1] 110/24</p> <p>me [77] 8/20 12/4 12/9 12/12 12/21 15/8 16/19 18/6 19/8 19/11 21/15 21/21 22/18 25/16 27/25 29/11 33/13 33/20 35/6 39/16 39/21 40/1 42/1 46/10 46/13 53/15 54/4 55/10 57/6 58/9 59/24 61/19 61/21 62/6 64/7 65/5 67/21 69/23 74/5 76/9 80/6 81/12 82/9 84/16 87/20 88/6 88/13 90/14 91/16 92/22 93/6 93/12 95/19 96/14 96/15 96/16 96/21 97/2 97/5 98/14 98/15 99/19 100/14 101/11 102/7 102/16 104/6 107/24 108/1 111/4 111/23 114/25 118/7 120/24 121/1 130/14 132/8</p> <p>mean [27] 17/14 21/4 26/21 27/24 37/6 44/3 47/7 54/11 68/13 71/19 71/23 71/24 73/9 75/8 77/22 87/22 89/16 90/10 98/22 99/15 113/3 114/9 119/18 122/4 122/23 122/24 123/1</p> <p>meaning [5] 16/25 72/24 88/1 100/11 123/9</p> <p>means [5] 27/9 75/9 87/5 87/8 87/13</p> <p>meant [2] 44/5 71/22</p> <p>measure [1] 15/5</p> <p>media [1] 38/4</p> <p>meet [1] 113/24</p> <p>meeting [3] 24/12 113/17 114/8</p> <p>meetings [2] 51/9 51/12</p> <p>Mells [2] 77/10 80/1</p>	<p>Mells' [1] 80/3</p> <p>memory [1] 108/4</p> <p>mention [1] 81/17</p> <p>mentioned [6] 43/6 48/7 74/18 84/23 85/5 110/2</p> <p>MERIWETHER [14] 1/16 3/9 23/15 33/8 33/11 80/19 81/4 81/12 82/6 84/7 84/8 85/12 85/21 88/18</p> <p>Meriwether's [3] 82/10 83/8 83/18</p> <p>met [1] 11/18</p> <p>Metro [62] 6/3 6/7 6/18 6/21 9/4 9/8 11/3 11/10 11/25 12/14 12/19 12/24 13/5 13/17 15/24 21/15 21/21 27/9 32/21 34/13 35/10 37/10 38/13 38/21 40/21 46/6 46/17 46/25 47/4 48/15 48/19 53/16 54/13 56/9 58/19 61/5 61/22 62/10 66/8 67/11 71/20 78/17 79/2 79/3 83/17 86/6 87/1 88/3 89/11 89/14 89/19 89/24 92/11 92/20 93/10 93/14 93/23 94/2 94/25 97/19 114/17 122/21</p> <p>METROPOLITAN [4] 1/6 1/12 1/19 3/22</p> <p>Michael [2] 104/19 106/8</p> <p>middle [2] 1/1 46/23</p> <p>might [19] 15/11 16/16 16/16 18/21 19/24 23/14 47/24 50/20 106/11 107/19 112/2 114/18 119/8 121/5 121/15 122/15 128/25 128/25 129/8</p> <p>mind [1] 59/12</p> <p>minded [1] 121/16</p> <p>minds [1] 65/7</p> <p>mine [1] 67/15</p> <p>minutes [2] 43/24 59/13</p> <p>misdemeanor [1] 109/6</p> <p>mishandling [1] 31/21</p> <p>missing [6] 77/18 77/25 79/20 80/4 80/10 80/13</p> <p>mistake [1] 80/6</p> <p>misunderstanding [1] 14/1</p> <p>misunderstood [1] 127/18</p> <p>MNPS [2] 77/14 100/11</p> <p>Mo [2] 11/17 11/18</p> <p>mode [1] 119/18</p> <p>model [1] 108/13</p> <p>month [2] 11/10 70/25</p> <p>months [3] 45/1 100/21 111/6</p> <p>more [11] 17/4 19/24 57/3 58/12 81/13 99/12 106/2 106/4 119/20 119/20 125/19</p> <p>MORENO [1] 1/9</p> <p>most [2] 18/2 60/6</p> <p>mostly [1] 96/9</p> <p>mouth [1] 92/21</p> <p>move [5] 16/10 16/10 16/11 16/15 117/10</p> <p>moved [4] 8/23 9/1 16/14 56/7</p> <p>movements [1] 58/4</p> <p>moving [2] 5/24 9/22</p> <p>Mr [6] 11/21 42/12 43/10 43/14 47/19 83/7</p> <p>Mr. [11] 8/16 11/14 18/14 19/1 38/17 42/11 42/17 87/3 97/6 100/16 112/21</p> <p>Mr. Brooks [1] 8/16</p> <p>Mr. James [1] 19/1</p> <p>Mr. Klein [2] 42/11 42/17</p> <p>Mr. Majors [1] 112/21</p> <p>Mr. Sam [1] 100/16</p> <p>Mr. Williams [1] 38/17</p> <p>Mr. Young [4] 11/14 18/14 87/3 97/6</p>	<p>Ms [51] 4/2 4/2 4/3 4/6 4/8 5/4 18/18 19/2 19/5 19/10 24/5 24/15 41/21 44/2 48/24 49/23 50/4 50/8 50/16 50/16 50/17 50/18 50/23 50/24 52/1 52/6 55/18 56/4 57/2 57/8 57/12 57/21 58/1 58/18 58/24 60/13 61/19 62/2 62/10 62/22 63/21 65/9 65/12 67/3 67/3 67/3 74/21 95/18 95/19 112/21 125/8</p> <p>Ms. [23] 18/15 18/19 26/5 48/1 48/2 49/3 49/9 50/13 51/8 52/6 52/22 54/20 56/3 58/11 59/17 62/5 64/14 66/17 66/25 69/20 69/23 69/24 71/2</p> <p>Ms. Batey [12] 26/5 49/3 49/9 51/8 52/6 52/22 54/20 56/3 69/20 69/23 69/24 71/2</p> <p>Ms. Batey's [1] 50/13</p> <p>Ms. Biggers-Matthews [1] 18/15</p> <p>Ms. Doe [1] 62/5</p> <p>Ms. Doe's [2] 58/11 64/14</p> <p>Ms. Harbison [1] 59/17</p> <p>Ms. Hill [1] 66/25</p> <p>Ms. Johnson [1] 66/17</p> <p>Ms. Patterson [1] 18/19</p> <p>Ms. Shepherd [2] 48/1 48/2</p> <p>much [2] 114/4 126/17</p> <p>multiple [6] 12/6 22/9 98/4 98/22 98/24 112/11</p> <p>multitude [2] 99/17 131/19</p> <p>Munoz [3] 5/8 95/21 95/22</p> <p>my [62] 5/7 8/23 12/23 14/2 14/15 14/17 15/21 18/5 19/9 23/9 28/16 29/23 30/2 30/21 34/20 39/1 41/19 41/24 45/2 47/22 54/3 54/23 56/5 56/6 59/21 67/21 68/2 71/5 71/25 73/18 73/18 76/13 77/16 77/23 82/16 83/5 89/5 91/15 92/21 93/6 96/1 96/21 97/2 100/24 101/16 102/1 103/8 103/13 104/2 104/15 104/21 105/22 106/17 106/22 107/2 111/2 112/20 120/22 124/2 127/5 132/10 132/21</p> <p>MyMNPS [1] 60/19</p> <hr/> <p>N</p> <p>name [20] 5/5 5/7 5/10 5/11 6/24 48/22 48/25 49/1 50/1 50/7 51/3 89/2 95/20 96/1 100/13 100/14 105/3 110/22 110/25 132/21</p> <p>named [1] 23/13</p> <p>names [2] 88/13 115/20</p> <p>naming [1] 81/10</p> <p>narrow [1] 122/10</p> <p>NASHVILLE [12] 1/2 1/6 1/12 1/20 2/9 3/2 3/12 3/18 3/23 5/17 35/10 35/11</p> <p>nashville.gov [1] 3/24</p> <p>nature [2] 12/20 107/18</p> <p>near [2] 5/25 6/3</p> <p>necessarily [4] 25/9 45/23 120/8 129/25</p> <p>necessary [2] 74/8 106/2</p> <p>necessity [1] 34/23</p> <p>need [9] 10/9 23/9 57/16 57/21 58/1 73/23 77/14 93/24 97/25</p> <p>needed [2] 59/10 123/15</p> <p>needs [2] 49/19 127/17</p> <p>neglect [1] 17/5</p> <p>never [6] 11/18 15/7 48/2 85/1 121/13 130/22</p> <p>new [4] 5/11 60/18 65/23 95/19</p> <p>next [10] 12/23 25/10 25/13 45/17 56/22 57/10 58/2 74/15 85/3 109/24</p>
---	---	---

N
 next-numbered [3] 74/15 85/3 109/24
 no [88] 1/5 4/6 4/8 4/10 4/12 4/14 4/15
 5/23 6/4 6/16 6/20 10/11 10/14 10/24
 11/18 11/23 22/17 25/22 25/23 27/6
 27/14 33/5 33/22 37/25 38/24 40/25
 42/8 42/16 43/1 43/12 43/20 44/13
 45/14 45/23 47/13 47/16 58/14 60/17
 61/23 62/8 62/13 65/17 65/20 66/17
 66/23 67/9 69/2 69/7 69/8 69/12 71/22
 72/10 73/1 73/14 73/17 75/1 76/11
 76/25 77/4 77/6 79/21 80/2 80/15
 83/16 84/7 84/25 86/17 88/10 89/16
 90/9 92/20 93/19 95/5 99/6 106/19
 109/25 112/8 113/3 115/5 115/10
 116/6 116/10 116/21 119/3 125/7
 127/18 128/12 131/9
 nobody [1] 72/25
 non [2] 128/2 128/6
 non-eligibility [1] 128/2
 non-eligible [1] 128/6
 nonrenew [3] 28/19 28/21 73/24
 nonrenewal [9] 26/6 26/9 26/17 73/6
 127/6 127/13 127/21 127/24 127/25
 nonrenewals [6] 28/7 28/14 70/25 73/4
 73/19 127/19
 nonrenewed [9] 7/11 27/7 27/12 27/17
 46/11 46/16 72/23 89/14 127/16
 normal [2] 45/20 105/12
 normally [3] 30/4 30/6 103/9
 North [1] 2/9
 not [207]
 note [1] 92/25
 noted [1] 129/6
 notes [11] 24/3 24/7 25/7 25/11 25/23
 51/13 51/14 52/12 53/12 53/13 106/11
 nothing [4] 46/1 89/12 96/10 120/24
 notice [3] 3/1 3/3 90/13
 notices [2] 45/12 72/19
 notification [1] 70/24
 notified [1] 71/4
 now [33] 6/9 18/3 19/7 22/3 23/23 27/8
 32/21 33/8 38/16 39/1 40/8 41/1 45/11
 46/6 47/14 60/18 62/22 63/16 63/18
 65/12 68/17 71/9 74/12 74/21 76/12
 89/6 91/1 97/21 98/23 104/21 105/23
 128/10 130/5
 number [12] 16/23 17/14 43/8 44/23
 48/5 48/8 61/10 74/19 84/24 85/7
 110/3 132/20
 numbered [3] 74/15 85/3 109/24

O
 oath [3] 13/19 92/3 93/7
 objection [45] 13/8 13/23 21/19 21/24
 22/21 23/11 24/21 25/4 25/18 28/2
 31/22 32/2 34/4 35/20 37/1 39/17
 40/11 40/18 48/17 50/9 55/5 59/1
 64/24 67/8 68/7 69/10 70/3 71/14
 72/15 80/7 81/8 84/25 85/15 85/25
 87/11 90/3 93/20 95/4 95/11 96/6
 109/25 120/2 123/12 131/1 131/12
 objections [1] 3/4
 objective [2] 65/5 121/16
 obligated [1] 67/22
 obligation [2] 24/1 24/11
 observed [2] 40/6 59/15
 obstruct [1] 71/17
 obviously [1] 119/16
 occur [5] 15/6 20/12 20/14 69/16 78/18

occurred [11] 13/4 20/11 38/2 41/12
 67/23 69/5 89/17 90/14 107/6 108/20
 126/11
 occurrences [1] 104/1
 occurring [1] 100/2
 occurs [3] 13/13 14/24 69/1
 off [6] 40/4 45/16 49/1 50/1 50/7 89/5
 offense [1] 117/20
 offer [1] 84/19
 office [24] 19/13 29/1 29/5 29/6 53/4
 54/12 54/13 55/1 59/5 65/19 67/11
 68/4 72/2 77/23 90/24 90/25 91/3
 101/13 102/9 102/15 113/2 113/13
 117/7 117/18
 officer [5] 24/24 67/16 111/9 111/18
 111/19
 officers [1] 30/1
 official [2] 34/18 35/1
 officials [2] 33/23 34/12
 okay [109] 6/9 7/1 8/20 8/25 9/16 10/6
 10/18 16/9 17/2 17/22 18/17 18/25
 20/17 22/18 24/10 25/22 26/1 26/6
 26/19 28/13 28/18 31/18 32/17 32/21
 33/4 33/23 35/1 35/17 38/2 39/1 39/21
 40/2 41/8 43/21 45/3 45/4 46/23 47/4
 47/10 48/4 49/9 49/25 50/3 54/10 57/1
 58/8 58/15 59/12 60/25 61/9 63/21
 68/17 70/14 71/5 72/17 73/8 75/20
 78/22 79/1 79/22 82/15 83/3 84/16
 87/2 87/7 89/3 89/6 89/18 90/23 92/14
 93/5 95/14 95/24 97/17 100/4 102/14
 102/17 103/15 104/21 106/20 108/3
 108/7 108/10 108/15 108/19 109/4
 109/22 113/8 114/10 114/23 116/7
 116/11 118/3 122/10 122/10 122/19
 124/2 124/7 125/3 125/22 126/5 127/8
 127/15 128/13 129/12 129/21 130/2
 130/5 131/23
 old [1] 60/5
 once [2] 68/16 82/23
 one [33] 6/21 6/22 11/6 11/6 16/11
 17/18 17/22 22/11 29/13 30/2 30/8
 37/13 37/13 38/9 48/13 48/15 48/19
 57/9 58/21 58/22 60/8 60/13 60/20
 65/14 67/4 79/9 88/17 94/22 97/2 97/5
 107/19 120/13 130/5
 ones [2] 88/5 117/14
 ongoing [2] 12/3 96/5
 online [1] 103/1
 only [20] 4/14 6/20 13/9 31/9 33/10
 39/22 48/23 55/18 64/7 65/22 69/23
 77/5 79/8 81/9 88/17 100/7 117/14
 119/6 120/3 124/4
 open [5] 25/23 45/24 51/20 119/7
 126/18
 opened [2] 26/2 45/24
 opening [1] 65/23
 opens [1] 46/1
 opinion [1] 91/15
 opportunity [2] 53/12 118/13
 opposed [1] 107/14
 options [1] 15/15
 oral [5] 51/18 84/3 129/5 129/7 129/12
 organization [10] 9/13 9/20 20/25 75/5
 82/2 82/4 94/16 104/7 110/23 123/21
 organizational [5] 61/14 62/16 62/24
 63/23 123/20
 organize [1] 107/20
 orientation [1] 99/16
 originally [1] 113/12

originated [1] 8/15
 other [35] 10/23 15/15 23/13 23/15
 23/18 30/8 31/8 32/6 40/8 52/25 54/13
 58/19 64/8 66/5 80/15 81/22 83/20
 89/3 89/15 94/5 94/9 97/2 97/5 98/11
 111/10 114/16 114/16 115/8 115/10
 116/9 116/23 119/21 125/4 126/12
 127/24
 others [2] 13/1 88/19
 otherwise [2] 16/15 119/8
 our [29] 14/21 18/21 20/25 30/4 30/17
 54/12 55/14 73/25 77/21 82/8 88/5
 88/10 93/23 99/11 100/19 106/3
 109/17 110/20 112/14 113/23 116/13
 116/21 117/5 117/18 117/23 118/11
 118/15 122/5 123/13
 ourselves [1] 123/17
 out [25] 9/1 13/18 15/15 19/8 35/1 42/6
 42/10 42/18 45/12 47/5 52/8 52/9
 58/16 61/25 70/25 71/11 73/20 77/19
 81/2 93/8 99/23 101/6 103/8 113/2
 121/17
 outcome [3] 107/11 110/9 132/16
 outside [10] 20/25 21/11 21/14 82/1
 82/4 82/6 98/15 103/23 105/12 116/24
 outsource [3] 30/20 82/5 82/9
 outsourced [6] 15/22 16/1 20/7 20/8
 42/11 47/19
 outsourcing [2] 15/25 52/24
 over [15] 11/9 14/20 16/25 44/7 44/8
 55/24 63/1 63/11 63/11 99/25 102/24
 106/16 112/8 114/1 125/12
 overall [1] 123/2
 overload [1] 98/7
 oversee [2] 14/2 79/7
 oversees [1] 103/13
 overwhelmed [1] 130/8
 overwhelming [1] 98/6
 own [4] 5/23 5/24 37/15 65/4

P
 P.O [2] 3/18 3/23
 page [17] 4/2 4/2 4/3 4/6 4/8 4/10 4/12
 4/14 4/15 41/2 41/4 59/25 60/19 60/21
 74/13 74/13 133/7
 pages [5] 4/10 74/15 106/5 132/9 133/4
 panel [2] 78/13 79/10
 paragraph [1] 107/25
 paraprofessional [1] 18/23
 parent [3] 31/20 48/22 48/25
 parents [2] 48/15 48/19
 part [10] 44/21 49/17 78/11 80/15
 87/16 106/15 106/22 107/2 113/23
 116/21
 partake [1] 78/15
 participated [1] 123/1
 participating [1] 124/17
 participation [1] 41/14
 particular [4] 45/15 74/23 105/11
 105/11
 parties [3] 79/11 90/13 132/14
 partnerships [1] 123/15
 parts [1] 123/21
 party [6] 15/23 20/7 20/9 28/11 28/22
 114/18
 passed [1] 8/24
 past [1] 106/21
 Patterson [2] 18/10 18/19
 pay [12] 27/2 56/12 56/13 56/16 56/17
 56/25 57/22 58/7 58/16 62/18 64/15

<p>P</p> <p>pay... [1] 64/22</p> <p>payroll [1] 9/19</p> <p>people [51] 9/21 13/10 13/19 13/25 16/9 17/3 23/13 26/23 26/24 31/9 31/10 37/7 37/16 37/20 64/9 65/25 66/4 77/13 77/21 78/23 81/22 90/10 90/20 91/16 91/19 91/19 93/1 93/11 101/5 102/2 106/10 119/15 119/17 119/19 119/19 119/23 120/7 120/11 120/13 121/5 121/9 121/12 121/19 121/23 122/3 122/7 122/12 124/11 130/10 130/17 130/20</p> <p>people's [2] 65/7 130/12</p> <p>perceive [1] 121/23</p> <p>perceived [2] 49/21 121/21</p> <p>percent [18] 55/12 55/15 55/20 55/25 56/1 56/10 56/12 56/15 56/17 56/18 57/3 57/22 58/13 61/13 62/11 63/1 63/1 64/22</p> <p>percentage [1] 95/2</p> <p>perceptions [1] 13/25</p> <p>perfect [1] 75/19</p> <p>performance [28] 32/10 46/17 46/21 61/11 72/23 73/7 73/21 73/23 73/24 74/1 74/3 75/12 75/14 75/16 125/1 125/11 125/23 126/13 126/22 127/12 127/13 127/16 127/19 128/5 128/7 128/20 128/23 129/5</p> <p>performing [1] 32/12</p> <p>periods [1] 130/6</p> <p>permanent [1] 16/17</p> <p>person [19] 16/6 16/8 16/13 16/15 27/18 32/4 44/7 56/14 78/12 78/19 97/2 97/6 100/12 103/22 108/23 109/13 111/3 120/3 123/11</p> <p>person's [2] 72/2 130/1</p> <p>personal [1] 119/25</p> <p>personally [2] 29/9 130/14</p> <p>personnel [5] 9/19 101/16 101/17 129/8 129/10</p> <p>perspective [1] 107/5</p> <p>Pertiller [3] 30/2 111/8 112/21</p> <p>petrified [2] 12/14 19/6</p> <p>piece [2] 46/3 58/5</p> <p>pieces [4] 46/5 64/6 64/7 112/12</p> <p>PIPPA [6] 1/16 3/9 23/14 33/8 80/19 88/18</p> <p>place [9] 28/1 49/18 49/19 70/11 73/18 98/21 117/9 117/12 123/22</p> <p>placed [9] 16/5 16/20 17/11 17/16 17/23 45/11 45/21 45/22 56/15</p> <p>placement [2] 27/6 46/4</p> <p>placements [1] 45/18</p> <p>Plaintiff [3] 1/4 1/10 3/14</p> <p>plaintiffs [4] 1/18 3/1 3/7 95/24</p> <p>plan [1] 50/5</p> <p>plans [4] 5/24 6/2 71/10 128/23</p> <p>please [4] 5/5 34/11 43/2 90/14</p> <p>plenty [1] 122/2</p> <p>PLLC [1] 3/17</p> <p>plus [1] 98/16</p> <p>point [10] 7/23 30/2 46/11 53/24 54/25 70/2 71/17 94/2 122/6 126/14</p> <p>policies [6] 11/5 34/9 56/9 94/7 99/11 110/6</p> <p>policy [10] 53/3 57/1 59/20 61/5 62/15 64/2 94/7 103/15 103/21 109/5</p> <p>poor [1] 61/11</p> <p>population [1] 123/7</p>	<p>portion [2] 43/25 71/6</p> <p>position [39] 26/21 26/22 27/1 27/4 27/9 27/11 27/13 27/14 27/18 27/22 38/13 46/8 47/12 55/11 55/19 56/7 56/8 56/14 58/4 58/24 62/11 62/25 63/16 64/5 64/20 64/22 65/3 66/20 66/25 67/6 68/19 68/23 71/21 75/5 75/15 75/18 79/19 80/21 111/16</p> <p>positions [6] 18/12 45/12 58/19 65/24 78/4 81/6</p> <p>possible [8] 77/12 78/21 79/16 92/17 121/5 121/19 122/11 128/5</p> <p>possibly [3] 51/23 98/17 131/22</p> <p>power [1] 119/9</p> <p>practice [1] 119/18</p> <p>practices [1] 110/11</p> <p>pre [1] 14/25</p> <p>pre-protection [1] 14/25</p> <p>precautionary [1] 15/5</p> <p>preconceived [1] 13/25</p> <p>premise [1] 36/3</p> <p>prepare [1] 96/15</p> <p>prepared [1] 12/4</p> <p>preschool [3] 10/8 10/9 10/15</p> <p>present [5] 113/17 125/13 125/18 125/21 125/25</p> <p>presentation [1] 127/4</p> <p>presented [3] 73/4 121/1 126/21</p> <p>presenting [1] 126/3</p> <p>preserve [1] 77/22</p> <p>press [5] 38/4 96/20 100/18 101/24 102/1</p> <p>pretty [5] 47/20 105/16 114/4 126/17 130/24</p> <p>prevalent [1] 13/18</p> <p>prevent [1] 13/12</p> <p>previous [1] 105/3</p> <p>previously [6] 43/6 48/7 74/18 84/23 85/5 110/2</p> <p>previously-mentioned [6] 43/6 48/7 74/18 84/23 85/5 110/2</p> <p>principal [30] 18/24 20/18 26/11 26/12 26/15 27/3 27/7 27/11 27/12 29/2 29/7 36/8 38/16 39/2 46/8 68/20 73/15 75/21 88/1 88/14 89/9 89/9 89/13 99/25 100/1 104/11 107/23 125/23 126/1 128/17</p> <p>principal's [1] 102/19</p> <p>principals [11] 26/13 87/20 87/23 87/24 88/20 96/19 107/20 113/25 113/25 125/10 126/23</p> <p>principalship [1] 33/19</p> <p>prior [10] 9/7 9/12 9/22 11/14 11/19 36/21 73/3 89/23 100/24 126/11</p> <p>probability [1] 95/9</p> <p>probably [8] 43/23 51/11 59/9 63/9 102/24 121/24 122/17 124/3</p> <p>problems [1] 73/23</p> <p>procedural [1] 56/21</p> <p>procedure [4] 3/2 78/17 79/1 79/2</p> <p>procedures [3] 34/9 55/14 61/10</p> <p>process [27] 5/9 12/2 28/11 33/11 33/16 54/24 66/2 66/13 73/5 73/13 78/11 78/16 79/7 81/15 96/8 106/3 113/23 114/1 114/22 117/2 117/16 118/16 118/17 125/12 127/20 127/25 128/1</p> <p>processed [1] 66/15</p> <p>processes [6] 81/14 82/14 118/15 122/1 125/17 126/4</p>	<p>proctor [1] 115/17</p> <p>professional [2] 10/20 112/3</p> <p>profit [1] 9/20</p> <p>progressive [1] 73/10</p> <p>promote [2] 118/18 121/11</p> <p>promoted [2] 37/13 63/17</p> <p>promotion [1] 63/19</p> <p>promotions [6] 26/24 59/19 61/1 61/2 61/6 74/14</p> <p>prompted [1] 75/25</p> <p>proper [1] 64/15</p> <p>properly [2] 54/19 55/2</p> <p>protect [16] 14/17 15/16 21/2 21/4 21/16 21/22 25/17 31/25 32/13 32/18 46/8 90/12 102/2 102/4 120/8 130/23</p> <p>protected [23] 14/3 29/16 30/16 42/2 54/9 87/4 87/21 90/21 95/9 98/9 98/21 99/4 99/9 99/14 99/17 99/21 102/14 103/17 116/19 117/1 120/10 120/14 120/15</p> <p>protection [1] 14/25</p> <p>protective [1] 95/3</p> <p>protocol [1] 53/3</p> <p>provide [3] 43/2 44/10 123/16</p> <p>provided [1] 44/11</p> <p>provisions [1] 3/2</p> <p>public [10] 35/11 76/6 100/18 101/4 101/10 101/12 101/13 101/22 102/5 130/11</p> <p>publication [1] 130/13</p> <p>publicness [1] 97/15</p> <p>pull [4] 56/22 56/24 126/7 126/17</p> <p>pulled [5] 105/10 105/14 105/17 105/18 127/3</p> <p>purpose [3] 32/4 34/22 89/22</p> <p>purposes [1] 85/3</p> <p>pursuant [1] 3/2</p> <p>put [16] 11/4 15/12 59/18 62/10 62/25 68/14 68/22 70/11 78/13 107/5 107/21 117/3 122/9 129/13 129/19 129/22</p> <p>putting [1] 92/21</p> <hr/> <p>Q</p> <p>question [19] 12/23 22/1 22/22 23/8 23/10 24/1 24/15 30/21 33/20 34/11 61/24 71/5 74/10 80/16 98/15 100/5 111/23 114/25 124/2</p> <p>questioned [2] 7/24 12/16</p> <p>questioning [8] 14/12 33/24 34/13 34/19 34/21 34/23 34/23 42/9</p> <p>questions [8] 3/4 42/5 79/6 95/16 95/17 114/6 119/7 125/5</p> <p>quick [1] 74/5</p> <p>quite [1] 5/19</p> <hr/> <p>R</p> <p>race [2] 41/9 99/13</p> <p>racial [2] 49/5 49/6</p> <p>raise [11] 24/13 24/22 24/23 25/3 31/12 34/20 34/20 35/6 36/1 36/16 87/24</p> <p>raised [11] 8/22 19/11 19/12 19/14 25/8 30/17 35/22 36/5 83/4 84/13 96/19</p> <p>raising [3] 25/7 30/10 50/21</p> <p>rate [1] 62/18</p> <p>rather [1] 105/11</p> <p>reached [1] 39/10</p> <p>read [9] 43/23 43/25 45/9 71/6 74/9 106/23 107/25 108/2 133/4</p> <p>reading [1] 3/3</p> <p>real [5] 49/17 74/5 121/21 121/24</p>
---	--	---

R		
real... [1] 122/8	83/13 84/2 84/11 89/2 94/1 96/12	rest [1] 49/24
realize [2] 22/9 95/1	96/13 96/14 100/9 100/13 100/13	restrict [5] 15/19 21/8 98/9 98/20 99/3
really [4] 103/7 119/1 119/7 123/5	100/25 101/1 108/7 108/9 110/13	restricted [1] 56/16
realm [4] 30/4 30/7 77/21 103/8	110/15 110/18 110/21 110/22 111/12	restructure [1] 128/3
reapply [1] 78/3	111/20 112/4 112/17 113/1 113/6	result [7] 46/7 47/17 51/6 83/18 109/19
reason [9] 32/19 37/15 42/6 54/4 54/6	113/20 113/21 114/8 115/20 115/21	111/11 111/14
60/15 109/14 124/14 124/16	120/18 131/22	resulted [2] 32/7 116/2
reasons [4] 31/8 65/4 77/12 125/11	remind [1] 95/19	resulting [2] 61/11 61/14
reassigned [1] 16/14	remotely [2] 67/1 115/23	results [3] 42/14 44/5 44/8
reassignment [1] 16/17	removal [4] 41/19 41/24 42/7 73/15	retain [1] 119/15
recall [22] 17/14 17/23 25/19 30/8 36/8	remove [1] 73/16	retained [1] 119/17
48/12 52/24 81/19 87/25 88/17 88/18	removed [1] 42/10	retaliate [1] 20/19
88/20 89/12 100/11 100/22 106/18	renew [2] 10/22 26/15	retaliated [38] 15/2 19/6 21/10 22/6
107/11 107/16 110/5 110/9 113/12	renewal [1] 26/14	23/25 24/6 31/4 31/7 31/14 38/18
115/15	renewed [1] 27/8	38/20 38/23 40/20 41/17 50/25 68/5
receive [3] 10/25 11/2 64/15	reorg [2] 41/20 41/25	68/18 69/2 80/22 87/8 91/9 91/24
received [1] 47/22	reorganization [1] 95/1	93/10 93/24 94/4 102/10 102/11
recent [1] 18/2	reorganizations [2] 59/19 61/2	102/20 102/21 103/19 103/19 121/7
recently [4] 5/8 17/20 63/17 99/1	replacing [1] 42/1	121/22 122/13 124/9 124/12 130/19
recognize [2] 41/2 84/17	report [12] 14/19 18/3 18/5 24/11 44/11	131/17
recognized [1] 93/17	68/9 91/4 91/8 115/6 115/7 115/15	retaliation [127] 12/11 12/16 13/6 13/12
recommend [3] 21/12 113/4 117/25	116/11	13/12 14/14 14/17 15/16 16/1 17/10
recommendation [16] 28/21 36/13	reported [8] 24/14 50/18 69/22 69/24	17/13 17/25 18/18 18/18 19/2 19/18
47/22 69/5 69/8 109/4 109/11 112/9	111/4 115/12 115/19 132/8	21/3 21/5 21/16 21/22 22/16 22/20
112/14 112/17 112/23 113/1 113/15	reporter [9] 18/8 42/12 43/22 74/6	22/25 23/5 24/16 24/20 25/14 25/17
114/1 114/11 126/9	84/18 86/21 107/9 132/7 132/20	25/24 26/3 29/2 29/6 29/15 30/6 30/9
recommendations [5] 66/11 73/3 87/23	REPORTER'S [1] 132/1	30/12 30/15 30/23 31/25 32/18 32/20
106/15 108/19	reporting [10] 14/19 59/8 109/6 111/3	32/22 32/24 33/1 33/6 33/9 35/23
recommended [2] 113/7 113/9	111/6 112/11 114/21 116/15 118/10	37/20 40/24 41/9 41/12 44/25 45/3
recommending [3] 8/2 117/17 127/11	132/19	50/20 51/22 52/5 52/20 53/4 53/17
record [11] 5/6 40/4 43/25 49/1 50/2	reports [1] 116/14	53/21 54/5 54/15 54/18 55/3 64/23
50/8 68/14 71/6 77/5 106/24 132/10	represent [3] 95/22 95/24 104/7	67/20 68/1 68/2 68/11 69/1 69/5 69/15
records [6] 76/6 100/18 101/4 101/13	represented [1] 23/19	69/16 69/20 69/21 69/25 70/2 70/7
101/22 130/11	reprimand [2] 129/4 129/10	70/15 70/15 70/20 72/18 80/18 80/25
Redirect [2] 4/3 125/8	reprimanded [2] 64/1 64/13	81/4 81/18 81/20 81/23 82/3 85/10
reduced [4] 56/6 57/3 58/16 61/13	reprimanding [1] 71/12	85/10 85/11 85/20 85/23 86/24 87/9
reduction [3] 55/12 56/10 61/20	reprimands [1] 129/1	88/2 89/10 89/19 89/22 90/1 90/2
refer [1] 103/22	request [6] 53/13 76/6 77/6 101/4	90/14 90/19 91/4 91/14 91/16 91/18
reference [1] 109/2	113/13 130/12	91/23 92/4 92/11 92/20 92/24 93/9
referred [1] 31/1	requested [3] 43/25 71/6 112/19	93/12 94/9 94/17 94/23 116/25 120/22
referring [4] 35/9 35/15 36/10 50/1	requesting [2] 16/13 113/12	122/5 124/8 124/11 124/11 124/15
refresh [1] 108/4	requests [4] 100/19 101/14 101/15	124/17 131/21
refused [1] 102/11	101/22	retired [3] 36/12 76/15 111/17
refusing [2] 102/18 103/20	requirements [1] 109/5	return [1] 15/18
regard [5] 24/16 25/13 81/5 112/6	requisitions [2] 65/23 66/1	returned [1] 9/2
126/4	research [1] 33/3	review [7] 53/12 53/13 99/22 112/18
regarding [12] 8/3 13/2 22/10 23/14	researched [1] 77/8	112/24 114/5 117/19
35/7 50/17 99/4 103/1 108/8 110/11	resembled [1] 108/11	reviewed [1] 100/3
118/15 131/20	reserved [1] 3/4	right [10] 36/18 74/12 87/24 92/15
regards [1] 102/4	reside [2] 123/25 129/7	98/15 104/21 105/1 111/5 122/16
regular [1] 18/22	resided [1] 123/5	123/22
rehire [3] 128/4 128/6 128/8	resides [1] 123/22	risk [7] 69/18 69/19 70/8 70/17 70/19
relate [1] 99/20	resignation [1] 7/15	71/11 71/13
related [9] 72/1 76/6 103/17 114/19	resigned [7] 7/12 7/16 36/20 38/2 38/25	role [7] 11/19 14/2 32/14 42/2 73/12
116/4 116/24 116/25 127/16 132/13	66/19 66/21	112/6 120/18
relations [17] 7/25 8/8 11/16 13/7 13/16	resigning [1] 38/1	Rules [1] 3/2
14/2 16/22 18/14 23/24 28/5 29/13	resolution [1] 15/14	rumor [1] 92/13
34/3 34/17 86/9 86/20 97/12 97/13	resolve [1] 103/4	rumored [1] 119/24
relationship [2] 34/14 131/6	resolved [1] 100/3	rumors [6] 91/10 91/12 91/13 91/17
relationships [1] 123/20	resource [3] 9/9 24/24 67/16	119/22 120/22
relevant [1] 70/13	resources [9] 19/13 30/1 77/24 97/25	run [1] 79/13
religious [1] 99/15	98/7 99/1 110/6 110/11 111/19	
rely [2] 64/8 70/12	respond [3] 35/5 100/20 101/17	S
remain [3] 102/12 102/18 103/20	responding [1] 84/12	safeguards [1] 70/11
remedy [2] 67/23 69/6	response [11] 43/23 67/21 82/17 82/18	safety [1] 86/16
remember [55] 6/15 12/9 16/3 17/18	82/19 82/21 83/20 83/22 84/1 128/25	said [47] 15/8 19/6 20/5 28/22 29/8
17/22 18/1 19/4 19/16 25/15 25/25	130/3	33/13 37/17 37/25 39/15 39/19 44/2
35/25 36/3 36/7 43/15 44/17 45/8	responsibility [3] 54/23 77/21 116/13	44/16 51/13 52/12 57/18 64/6 66/14
47/21 47/25 51/23 52/21 56/2 60/10	responsible [7] 29/14 30/23 31/3 97/3	67/18 70/9 72/10 77/22 81/21 83/19
	112/12 114/20 123/3	84/10 84/11 88/2 90/20 91/16 91/24

S	see [19] 22/15 41/18 41/20 42/2 43/24 47/8 52/4 56/24 59/21 61/1 61/9 62/4 64/17 64/17 64/23 67/22 104/21 112/18 117/19 seeing [2] 108/9 108/11 seemed [1] 100/23 seems [3] 98/6 98/15 105/12 seen [5] 52/20 74/21 74/23 85/1 122/8 selected [1] 33/12 selection [5] 33/11 33/17 33/17 33/18 81/15 send [3] 47/23 63/24 99/21 sending [1] 114/19 senior [1] 10/20 sense [1] 107/21 sense or [1] 107/21 sent [7] 33/13 40/1 41/1 41/5 46/13 69/23 82/20 sentence [1] 41/23 separate [4] 15/18 16/5 16/9 69/15 separation [2] 8/13 36/14 seriousness [1] 113/10 services [2] 9/17 63/11 set [3] 15/5 34/10 72/24 several [2] 25/1 56/17 sex [1] 99/13 sexual [6] 11/5 36/9 36/24 37/8 99/13 99/15 sexually [3] 17/21 34/1 34/15 shall [1] 61/12 share [7] 13/25 35/4 39/11 39/23 44/5 53/14 104/15 shared [8] 35/6 39/11 64/4 76/4 83/4 83/8 83/11 101/5 sharing [1] 30/10 Sharon [5] 28/20 30/2 38/23 89/1 111/8 Sharon's [1] 111/16 Shawn [1] 93/16 she [78] 19/7 19/8 19/11 24/6 24/10 24/13 33/9 33/12 33/13 33/14 33/15 33/19 39/15 39/18 40/3 42/1 49/2 49/5 49/9 49/11 50/5 50/13 50/24 50/25 51/5 52/8 55/20 55/20 55/23 55/24 57/3 58/1 58/3 58/12 58/12 58/22 58/24 59/6 60/14 60/14 61/20 62/3 62/23 62/25 63/22 64/14 64/18 64/21 64/23 65/3 65/3 65/20 66/19 66/21 67/1 76/15 76/16 76/19 76/21 77/1 77/1 81/21 81/23 82/6 82/10 82/13 82/19 83/9 84/12 111/8 111/17 114/6 125/14 125/14 125/15 125/15 125/17 131/10 she'll [1] 114/5 she's [2] 56/7 131/3 Shepherd [3] 47/24 48/1 48/2 should [28] 13/21 18/19 19/9 19/10 43/11 47/8 49/21 53/21 55/25 57/4 63/25 64/4 67/12 67/13 75/16 78/18 80/22 83/12 86/18 89/19 89/20 90/1 128/16 128/21 129/5 129/18 129/21 133/7 show [3] 39/22 106/20 107/24 showing [1] 124/24 shown [1] 59/25 SHRM [1] 10/19 side [3] 63/5 63/8 63/25 sign [1] 53/10 signed [1] 107/17 significant [3] 37/2 37/6 126/16 signing [1] 3/3	silent [3] 102/12 102/18 103/20 simply [1] 112/6 since [4] 16/21 17/15 89/14 98/8 single [1] 123/3 sit [3] 47/16 51/19 71/9 site [1] 129/9 situation [29] 8/16 14/21 15/9 15/13 16/18 20/16 21/13 29/9 34/10 38/8 38/10 46/4 46/24 50/18 65/11 65/12 69/6 70/10 72/1 72/2 72/21 85/24 86/2 90/16 102/25 103/9 105/17 108/8 122/7 situations [4] 29/21 90/22 100/10 119/11 six [1] 45/1 size [1] 77/25 skills [1] 132/11 Slave [4] 48/10 50/6 51/1 64/19 small [2] 70/12 90/20 SMS [2] 9/13 9/15 so [119] 5/8 6/5 7/8 7/16 8/2 8/7 8/17 11/18 12/23 13/18 14/20 14/23 15/8 17/6 17/15 18/17 18/21 24/5 25/12 26/1 26/13 26/15 28/13 30/1 30/2 30/6 30/12 31/1 31/10 33/4 34/11 36/4 37/18 40/3 44/8 44/11 45/5 46/4 46/11 46/15 47/7 47/14 49/9 49/23 50/4 50/23 53/2 56/14 58/3 58/5 58/10 60/21 63/20 66/7 68/25 69/8 69/23 71/1 71/19 72/9 73/20 74/14 76/25 77/5 78/11 79/1 79/5 79/12 81/17 83/8 86/2 90/4 91/10 92/14 93/2 95/23 97/15 98/8 98/25 99/18 100/13 100/21 101/10 103/2 104/9 106/2 107/9 107/9 108/7 109/12 111/19 112/9 112/11 114/3 116/2 116/17 117/2 117/9 117/14 117/16 118/4 118/19 120/5 121/7 122/5 123/5 123/18 123/19 123/21 125/1 125/17 125/22 126/8 127/6 127/11 127/15 129/4 129/9 130/17 solely [2] 32/5 32/19 some [27] 7/5 11/6 29/20 37/2 40/15 49/6 52/15 55/16 79/19 84/12 91/22 96/4 102/3 107/21 109/2 110/10 110/19 111/19 112/3 118/6 121/2 122/24 122/25 123/1 124/19 129/13 130/16 somebody [28] 15/10 15/12 18/1 18/23 20/25 21/9 56/17 63/4 64/5 68/1 71/24 79/8 88/25 92/4 92/7 92/22 102/23 102/24 104/3 109/3 110/20 117/3 117/17 118/6 120/10 120/16 121/15 127/21 somebody's [3] 67/13 101/4 104/5 someone [37] 15/1 15/16 18/17 23/23 30/19 31/2 33/25 34/14 36/1 36/4 42/1 46/16 47/10 54/17 55/10 59/5 62/15 63/25 69/14 72/23 75/15 81/1 81/24 82/22 90/1 99/19 101/19 102/7 102/17 102/18 103/16 103/23 115/6 119/14 124/7 127/11 127/15 something [53] 19/22 19/25 20/2 20/10 20/12 20/13 21/10 30/3 44/18 45/24 48/12 51/4 55/14 55/15 57/4 66/14 67/17 67/22 67/24 68/15 71/1 71/16 71/19 72/11 74/7 77/2 77/20 91/5 91/9 91/24 92/7 97/16 100/4 102/9 102/12 102/15 103/7 103/16 103/21 105/19 107/16 107/16 107/20 107/24 108/11
---	--	---

S		T
something... [8] 109/19 113/21 120/21 121/3 121/14 123/22 123/24 125/6	still [10] 32/8 37/14 42/25 43/4 82/23 83/1 114/6 114/13 114/17 120/8	table [2] 51/19 51/24
something's [1] 68/18	stone [1] 72/24	tail [3] 8/15 37/25 38/6
sometime [1] 110/6	stop [2] 21/5 93/25	take [13] 21/8 25/10 26/24 28/1 40/3 49/19 57/16 57/21 58/2 60/25 72/6 114/11 118/13
sometimes [3] 106/1 106/23 107/10	stores [1] 9/10	taken [8] 3/1 25/20 46/13 50/19 57/25 73/10 106/11 124/16
somewhere [1] 16/14	Story [1] 111/17	takes [1] 62/23
son [3] 50/14 51/7 64/19	Stratford [1] 104/16	talk [5] 67/25 98/13 121/10 121/10 121/12
sorry [3] 41/21 50/12 127/18	streamline [1] 106/3	talking [5] 26/10 26/10 45/6 82/13 96/25
sort [4] 12/25 22/19 129/13 131/15	Street [1] 3/12	taught [7] 39/16 48/11 48/14 49/14 50/14 64/19 131/8
sounds [3] 45/19 93/7 93/7	stressful [2] 96/23 130/14	teach [4] 10/2 10/4 10/6 10/15
source [1] 114/16	structure [1] 111/2	teacher [11] 7/10 10/1 17/20 17/21 18/22 26/10 27/4 27/6 38/15 46/1 115/17
South [1] 9/1	structured [1] 123/5	teaching [6] 27/14 45/11 47/2 47/6 47/11 47/12
speak [8] 13/1 20/15 21/18 37/4 54/2 54/3 65/22 121/25	student [5] 49/8 49/22 50/19 50/21 102/17	Teams [1] 53/13
speaking [1] 51/6	student's [1] 48/19	tell [45] 7/16 8/20 11/25 12/6 12/8 12/10 12/19 16/19 21/15 21/21 22/18 25/16 28/8 42/19 42/23 43/11 44/2 53/15 53/19 54/4 55/10 57/13 61/19 61/21 62/6 68/4 68/6 73/16 75/17 76/7 76/9 76/11 76/20 77/13 77/14 82/9 87/20 88/13 93/3 93/6 96/16 98/14 100/14 107/10 122/1
specialized [1] 11/2	students [4] 49/14 103/2 107/13 115/23	telling [8] 12/9 27/18 27/19 48/1 57/15 58/1 67/21 92/22
specific [5] 57/19 65/24 96/10 100/9 112/1	students' [1] 116/1	tells [4] 31/4 41/8 41/12 79/3
specifically [24] 19/4 19/16 20/1 23/16 37/4 44/17 49/4 51/23 75/25 77/11 81/11 94/13 96/25 100/9 100/11 100/14 101/1 110/11 110/13 111/20 112/4 113/3 113/6 131/22	studies [1] 9/25	template [1] 105/22
specifics [2] 20/22 31/13	stuff [8] 11/6 93/2 96/17 100/16 101/18 102/6 126/17 129/2	temporary [1] 16/16
speculate [3] 27/25 27/25 29/11	subject [4] 13/13 30/18 30/19 32/9	ten [1] 59/13
speculating [1] 58/9	subjected [2] 49/8 81/22	TENNESSEE [14] 1/1 1/7 1/13 1/20 2/9 3/2 8/23 9/2 9/12 108/20 109/7 132/3 132/7 132/19
speculation [1] 91/10	submit [1] 106/13	tense [1] 130/9
speculative [2] 91/12 122/17	submitted [3] 105/2 106/12 116/15	tenured [5] 27/4 27/6 27/13 27/20 27/20
speculatively [1] 93/2	subpoena [1] 6/6	term [3] 26/20 87/4 91/7
spell [2] 5/10 9/14	substance [2] 115/21 121/2	terminate [4] 114/11 114/25 115/2 118/23
Spencer [2] 63/15 63/17	substantiate [1] 69/4	terminated [4] 7/12 7/13 8/4 113/9
spoken [3] 49/1 50/1 50/7	substantiated [3] 37/3 107/18 116/8	terminating [1] 119/14
spring [1] 89/7	substantive [1] 121/3	termination [8] 7/15 8/2 8/3 72/19 84/20 109/7 113/12 117/18
staff [2] 55/12 77/14	success [1] 73/11	terminations [1] 28/7
staffing [2] 110/19 111/1	successful [2] 119/20 119/21	terminology [1] 125/20
staffing-wise [1] 110/19	such [6] 31/19 45/16 52/25 126/15 128/16 130/7	terms [8] 11/5 13/5 26/10 26/11 31/10 32/9 118/17 124/17
standard [1] 53/3	sudden [1] 124/18	test [1] 115/23
stands [1] 104/7	sue [1] 7/14	testified [4] 8/8 40/9 43/16 120/21
start [2] 8/17 63/9	sued [2] 34/1 34/15	testify [2] 12/15 60/13
started [5] 8/14 37/17 97/18 100/7 100/11	suffered [1] 62/24	testimony [4] 40/21 68/3 120/23 133/5
starts [1] 45/17	suffers [1] 62/15	testing [10] 103/12 103/13 104/11 115/10 115/16 115/18 115/25 117/8 123/19 123/19
state [12] 5/5 7/20 7/23 49/3 75/4 112/11 114/21 115/13 116/14 118/10 132/3 132/7	suggesting [1] 127/21	than [22] 17/4 23/15 26/17 27/10 27/14 30/8 56/18 57/3 58/13 62/11 63/2 83/20 89/3 89/15 94/5 94/10 106/2 106/5 114/16 115/8 116/9 127/24
stated [1] 43/13	suit [1] 7/17	Thank [2] 5/15 39/24
statement [3] 20/10 37/7 92/10	Suite [2] 2/9 3/22	that [757]
statements [5] 13/20 26/2 53/9 93/22 131/10	summary [8] 4/15 52/18 52/19 52/23 104/23 105/6 105/21 106/4	that's [58] 10/16 10/17 15/7 24/14 26/16 27/10 35/6 37/6 40/5 40/22 41/7 42/1 44/18 49/13 52/16 56/11 56/19 58/9 59/14 60/3 60/5 60/6 61/1 61/18
STATES [1] 1/1	superintendent [1] 103/11	
static [1] 121/17	supervisor [10] 57/10 57/11 57/17 57/23 58/2 62/6 71/4 75/17 126/2 126/2	
statistician [2] 95/7 95/13	supervisors [2] 58/21 117/12	
statistics [2] 75/23 95/10	support [26] 4/10 55/11 56/7 56/19 60/3 60/5 61/7 71/20 71/20 73/6 73/11 73/14 74/12 90/17 91/1 91/2 104/9 105/15 117/11 117/12 117/20 118/1 118/18 118/21 119/19 125/15	
stature [1] 26/23	supported [5] 9/21 28/24 32/6 32/20 110/20	
status [1] 66/5	supporting [1] 127/23	
statute [1] 108/24	supposed [5] 32/11 32/12 32/14 79/23 115/24	
statutes [1] 109/1	sure [18] 8/10 15/5 40/12 50/7 58/10 60/8 60/12 63/4 66/12 79/4 90/15 100/3 105/19 108/25 114/2 120/20 123/22 131/20	
stay [2] 56/13 65/5	surrounded [1] 65/1	
Steel [1] 104/19	surrounding [1] 72/21	
Steele [12] 106/8 107/12 107/22 108/12 112/5 113/19 114/12 114/13 114/16 115/8 116/9 116/12	surveys [2] 122/24 122/25	
Steele's [1] 107/18	suspension [2] 117/17 126/10	
Stefan [1] 38/12	swore [1] 13/19	
Steiner [8] 3/10 3/11 3/11 4/2 4/3 5/4 41/21 125/8	sworn [1] 5/3	
steinerandsteiner.com [1] 3/13	system [2] 90/17 103/2	
step [1] 64/8	systems [1] 66/3	
steps [4] 25/10 25/13 25/19 73/10		

<p>T</p> <p>that's... [34] 64/23 71/22 72/10 75/7 75/17 84/16 87/12 87/16 90/18 90/18 94/23 98/9 99/1 99/10 103/13 103/17 103/21 103/23 104/6 105/19 106/22 108/18 110/25 119/6 119/13 122/17 123/3 124/15 125/10 126/9 127/7 130/13 130/20 131/24</p> <p>their [43] 12/15 13/20 27/16 32/10 32/14 37/9 37/13 37/15 37/21 40/10 40/17 40/21 51/14 51/15 55/11 58/5 59/10 62/21 72/6 73/11 75/15 75/18 77/14 78/4 94/6 100/14 101/6 107/14 119/12 120/6 121/23 123/23 126/1 126/2 126/15 128/8 128/19 128/19 129/2 129/6 129/7 130/4 131/2</p> <p>them [52] 6/15 6/20 13/11 14/16 14/17 16/21 24/1 27/18 27/19 28/8 30/10 32/13 32/18 37/4 37/9 37/22 39/11 43/4 47/22 47/23 53/12 53/14 53/14 58/7 62/21 66/9 68/4 68/8 75/17 75/17 79/5 88/6 88/7 88/11 90/13 94/5 99/21 99/23 106/11 108/16 114/5 117/9 117/10 117/12 119/10 119/13 120/8 121/24 124/17 126/10 130/21 130/21</p> <p>then [48] 10/10 12/23 13/11 16/14 20/23 25/12 26/1 28/13 28/23 30/4 30/12 32/5 32/20 44/11 46/1 47/4 47/14 50/4 50/23 52/8 52/15 64/21 66/4 66/7 68/25 69/5 74/10 74/13 78/13 79/1 86/9 86/11 99/11 99/24 104/12 112/18 112/20 112/23 113/15 113/23 114/6 117/23 118/6 119/10 121/24 124/18 125/22 127/15</p> <p>there [119] 5/18 11/23 11/23 11/24 12/3 12/6 12/10 13/6 13/17 13/18 15/16 15/20 17/5 17/15 21/13 23/12 27/6 32/6 36/16 37/2 38/4 39/2 43/17 45/15 46/12 46/19 49/6 49/17 49/18 52/2 52/23 55/16 66/4 68/14 69/7 69/8 69/11 73/4 75/22 77/7 77/23 80/18 80/21 82/16 83/19 83/22 84/4 85/9 85/20 87/18 88/3 88/15 88/18 88/22 89/15 89/18 89/25 90/24 91/3 91/4 91/8 91/10 91/13 91/17 91/19 91/22 91/23 92/3 92/10 92/14 92/19 93/8 93/11 93/15 93/23 95/13 96/4 96/17 96/18 96/19 97/1 97/2 97/6 98/4 98/8 98/24 98/25 99/7 100/6 100/7 100/12 101/6 103/15 103/21 107/1 110/10 110/19 111/19 111/23 112/9 113/22 115/17 119/22 119/23 120/24 122/2 122/12 122/14 123/2 125/22 127/22 128/20 128/21 128/21 128/23 129/1 129/3 130/15 131/19</p> <p>there's [23] 14/12 17/7 73/5 73/14 73/17 88/2 91/10 95/23 97/21 98/22 99/16 118/13 123/17 123/18 123/18 123/19 124/15 124/18 126/8 126/12 126/18 130/3 130/9</p> <p>thereafter [1] 79/25</p> <p>these [10] 25/7 28/7 43/13 51/9 51/12 53/25 67/4 81/3 129/12 129/17</p> <p>they [139]</p> <p>they'd [1] 46/22</p> <p>they'll [3] 119/20 122/13 127/23</p> <p>they're [27] 27/17 27/20 27/21 31/7 62/17 68/13 102/20 102/20 103/18 103/18 103/20 116/15 117/6 117/24 119/11 121/6 122/6 124/12 124/13</p>	<p>124/21 124/22 124/22 124/23 124/24 127/19 127/21 130/11</p> <p>they've [6] 37/14 73/12 99/20 122/24 124/9 128/8</p> <p>thing [3] 13/9 45/20 121/9</p> <p>things [27] 17/7 31/19 32/14 33/15 72/18 77/15 84/12 90/10 96/4 98/22 100/18 100/20 107/5 107/5 107/21 110/22 121/18 121/25 122/14 123/9 123/9 123/18 123/19 125/2 125/17 125/18 129/17</p> <p>think [69] 8/12 10/22 11/20 12/2 14/1 15/2 15/17 19/8 19/15 23/4 23/22 23/24 24/6 24/22 31/9 36/21 38/22 48/18 49/16 49/17 50/9 54/6 56/11 58/6 62/19 63/15 64/23 67/3 67/15 68/5 69/4 70/23 74/16 76/3 89/3 89/6 90/17 92/22 93/11 94/15 94/21 95/14 97/1 100/16 100/17 102/20 103/11 105/13 106/10 106/17 107/19 108/12 111/10 112/1 113/11 114/18 119/3 119/9 119/9 120/17 123/4 123/13 125/17 128/19 130/9 130/9 130/13 130/20 131/21</p> <p>third [4] 15/23 20/7 20/9 41/4</p> <p>third-party [1] 15/23</p> <p>this [96] 6/5 7/23 12/23 13/6 13/17 23/14 39/21 40/1 40/4 40/9 40/16 40/23 41/1 41/2 42/23 44/24 44/25 45/5 45/7 46/7 46/10 47/14 47/15 48/1 48/4 48/10 49/24 52/24 56/25 57/21 57/25 58/2 59/25 60/2 60/8 60/13 61/1 61/19 62/14 67/19 68/1 71/17 71/21 72/2 73/17 74/5 74/7 74/9 74/21 74/23 75/2 75/4 75/11 79/7 81/21 81/22 84/16 84/17 85/1 93/6 93/18 93/25 95/8 95/23 95/24 98/14 99/18 102/8 104/2 104/23 105/5 105/5 105/8 105/10 105/11 105/19 105/19 105/20 105/24 106/13 107/11 107/25 108/4 108/7 108/24 108/24 109/11 109/14 109/15 109/15 109/18 109/23 111/23 121/20 131/25 132/16</p> <p>thoroughly [1] 15/13</p> <p>those [32] 23/18 27/23 27/24 28/1 28/10 28/23 29/21 29/22 33/15 37/19 42/25 43/2 43/10 51/18 65/14 70/24 73/3 76/17 81/10 87/1 90/22 99/14 100/20 101/19 103/25 117/18 118/1 118/8 119/5 127/19 128/23 130/5</p> <p>though [2] 38/3 82/19</p> <p>thought [9] 12/18 40/20 43/11 43/16 50/14 50/25 62/2 102/10 130/17</p> <p>three [6] 77/23 81/10 97/21 98/16 117/13 124/4</p> <p>through [21] 11/4 54/3 60/20 66/1 66/1 66/3 66/16 82/8 87/1 87/19 88/3 89/8 94/25 98/11 98/13 114/4 114/22 117/18 127/17 127/20 133/4</p> <p>throughout [2] 77/25 97/4</p> <p>time [47] 11/20 12/5 15/24 17/23 24/24 36/18 38/15 44/24 47/24 49/18 52/2 56/23 60/10 60/20 63/14 78/20 79/5 79/9 83/5 83/6 87/17 88/15 88/21 94/3 96/18 96/20 97/5 98/23 101/2 101/3 103/11 106/18 109/17 111/17 112/16 112/21 112/25 113/6 117/3 119/1 119/3 119/6 120/19 124/25 130/6 131/4 131/5</p> <p>timeframe [1] 100/23</p>	<p>timeframes [1] 115/25</p> <p>timeline [2] 29/8 106/21</p> <p>times [4] 6/12 15/17 98/6 98/22</p> <p>timing [7] 7/5 19/16 60/17 60/22 65/2 68/21 70/23</p> <p>title [6] 11/20 63/18 98/24 99/10 99/11 99/11</p> <p>TN [4] 3/12 3/18 3/23 47/7</p> <p>today [9] 22/4 23/10 32/25 33/4 47/16 68/3 71/9 75/20 93/6</p> <p>today's [1] 89/8</p> <p>together [7] 78/14 103/3 106/10 126/8 126/17 127/3 131/3</p> <p>told [18] 12/3 12/12 12/21 27/16 39/14 50/16 57/21 68/17 76/2 78/3 79/24 83/15 96/4 96/12 96/13 96/14 101/23 114/23</p> <p>Tony [1] 111/18</p> <p>too [6] 37/7 44/18 56/23 101/5 114/21 129/3</p> <p>took [3] 11/9 54/21 65/25</p> <p>top [7] 56/12 56/15 56/25 89/5 104/24 105/1 106/12</p> <p>Torrington [1] 8/22</p> <p>towards [1] 15/14</p> <p>train [3] 28/6 28/8 28/10</p> <p>trained [1] 52/9</p> <p>training [11] 10/25 11/1 11/2 11/4 11/6 103/2 111/24 112/1 118/11 118/14 119/2</p> <p>transcript [2] 132/9 133/5</p> <p>transfer [8] 26/17 26/19 26/20 26/21 26/22 26/23 26/24 27/10</p> <p>transferred [5] 27/21 47/11 55/11 55/20 64/21</p> <p>transfers [5] 28/15 59/19 61/2 61/6 66/4</p> <p>transition [2] 97/1 101/11</p> <p>transpired [1] 60/23</p> <p>Trauger [1] 1/6</p> <p>treatment [2] 37/8 37/22</p> <p>tried [1] 106/3</p> <p>trouble [1] 79/13</p> <p>true [5] 26/4 47/4 122/22 132/10 133/5</p> <p>truth [1] 119/25</p> <p>truthful [1] 91/12</p> <p>try [17] 6/5 10/12 53/9 56/22 56/24 65/6 70/10 70/11 94/7 94/11 98/9 101/7 103/3 118/21 121/16 122/20 123/21</p> <p>trying [5] 35/25 93/18 96/21 107/4 107/20</p> <p>tumultuous [1] 100/21</p> <p>two [15] 4/10 10/17 10/18 39/22 43/24 57/6 57/7 64/8 65/14 74/15 95/17 97/7 97/18 100/7 116/2</p> <p>type [4] 55/16 89/21 103/8 119/1</p> <p>types [1] 115/10</p> <p>typical [1] 46/19</p> <p>typically [4] 30/13 46/17 53/9 68/4</p> <p>U</p> <p>ultimately [5] 44/7 73/2 113/15 117/23 125/14</p> <p>under [8] 13/19 28/16 30/16 75/24 92/2 93/6 97/8 108/19</p> <p>understand [10] 7/22 31/15 31/24 46/4 58/7 75/22 87/7 92/25 94/11 126/20</p> <p>understanding [12] 28/14 34/22 39/1 50/12 50/23 68/3 76/3 76/13 82/16</p>
--	--	---

U		
understanding... [3] 99/8 120/23 127/5	114/9 116/4	40/8 46/25 47/1 47/5 47/16 52/3 56/8
understood [2] 28/20 66/19	Waverly [1] 48/11	56/25 57/20 58/15 62/9 64/11 69/17
underwent [2] 111/25 112/2	way [6] 32/12 65/3 99/6 102/8 122/9	70/19 71/11 71/15 74/2 76/5 76/25
unfortunately [1] 112/8	132/15	81/3 81/6 86/13 92/13 93/3 99/24
unit [1] 123/3	we [136]	113/4 117/4 118/15 119/25 120/16
UNITED [1] 1/1	we'd [2] 63/4 126/13	121/21 122/22 124/8 126/18 126/19
unlawful [2] 104/5 124/11	we're [11] 50/9 52/17 56/24 60/25	131/16
unless [4] 25/9 54/8 55/16 130/3	73/19 98/3 98/21 125/1 126/3 127/6	which [11] 6/22 41/21 75/25 83/4 100/5
unpack [1] 97/17	127/25	100/8 105/2 112/20 117/2 117/7
until [5] 15/13 68/25 88/15 88/22	we've [6] 25/1 29/20 74/12 98/7 107/9	128/22
129/10	129/17	whichever [1] 56/13
untouchable [3] 91/20 119/24 119/24	week [3] 6/23 7/21 8/9	while [1] 96/21
up [28] 14/20 15/5 26/14 31/20 34/10	weekly [4] 18/21 24/11 51/9 51/12	whistle [1] 31/12
42/19 45/25 46/1 48/3 51/6 52/18	weeks [4] 28/25 29/4 29/10 64/19	whistleblower [11] 29/18 30/6 30/13
52/19 56/22 56/24 59/18 62/17 65/23	well [20] 14/19 15/7 22/14 46/10 49/21	30/24 31/5 31/8 31/9 31/15 31/24 32/6
78/14 80/3 80/10 105/18 109/6 116/1	63/14 68/4 68/12 97/7 100/19 101/3	87/10
117/7 117/13 119/7 124/24 126/14	102/7 106/14 107/24 111/22 113/23	White's [5] 20/18 46/9 68/20 68/23
updated [5] 60/10 60/11 60/21 60/21	124/10 126/1 127/5 128/19	75/21
60/24	went [8] 9/4 10/16 11/3 48/2 94/25 97/9	who [82] 11/8 11/13 11/16 16/5 16/6
updates [2] 51/15 51/17	115/24 131/21	16/8 16/10 17/19 18/7 21/9 22/19
upon [2] 34/14 70/12	were [108] 6/14 6/15 6/16 6/18 7/24	22/25 23/4 24/25 28/6 29/13 29/22
upset [1] 101/6	10/1 12/1 12/3 12/6 12/14 12/16 13/19	29/24 30/18 33/25 34/14 34/18 34/24
us [25] 14/22 30/17 31/8 35/6 36/21	14/12 16/1 18/25 19/17 22/8 23/18	35/12 36/6 37/8 37/19 38/11 38/24
59/10 59/11 60/20 68/6 87/23 90/22	24/5 25/10 25/20 27/13 31/13 33/24	39/5 39/11 40/9 42/19 43/11 43/19
94/5 94/6 98/2 101/5 112/2 113/14	34/12 34/13 36/16 37/2 37/3 37/9	44/3 44/7 48/13 51/24 52/2 53/15
113/15 114/14 122/3 123/16 124/6	37/19 37/20 39/8 39/9 39/10 39/10	57/12 62/6 63/6 63/13 65/13 65/16
125/2 125/15 127/23	39/13 40/10 40/15 40/17 43/7 51/16	65/24 73/20 76/2 77/13 78/23 83/6
use [2] 31/9 79/4	54/24 55/18 55/23 60/13 61/21 61/25	87/20 88/1 88/8 88/13 88/14 88/24
used [3] 79/14 105/20 109/1	63/11 66/4 67/2 67/4 72/3 75/22 78/3	89/9 93/14 95/2 99/3 101/19 102/21
usually [3] 70/25 103/25 128/2	78/3 78/7 78/9 79/19 79/23 79/24	103/4 103/5 104/10 106/13 106/18
utilize [1] 105/24	80/13 80/22 81/7 83/22 85/9 85/19	111/7 112/17 115/12 115/15 117/14
utilized [1] 105/23	86/5 86/8 88/18 91/17 91/19 91/20	119/24 120/15 127/3 127/8 127/10
	93/11 95/2 96/3 96/4 96/5 96/18 97/3	130/23 131/17
	100/10 102/10 102/11 103/5 103/6	whoever [3] 54/21 73/16 112/24
	104/16 110/10 110/12 111/19 112/13	whole [1] 64/10
V	113/17 113/25 114/23 115/22 116/1	whose [3] 89/13 100/12 122/21
valid [1] 53/22	118/25 119/22 119/23 119/23 120/10	why [24] 24/1 24/8 31/13 41/12 41/16
valued [1] 46/20	120/23 122/1 126/15 128/20 128/21	42/10 54/4 55/7 62/10 66/17 66/21
Vanessa [1] 33/21	128/24 130/16 131/19	66/23 72/5 75/18 75/20 77/6 77/19
version [1] 60/22	weren't [1] 115/24	82/9 83/4 83/11 98/9 98/14 105/25
versus [2] 118/23 119/21	what [163]	116/11
very [15] 21/11 26/20 36/23 37/18	what's [8] 24/15 28/8 45/23 45/24	wife [1] 38/23
94/13 95/8 95/8 96/2 96/9 96/20 96/22	51/13 52/12 59/21 60/4	will [15] 13/11 53/10 61/15 62/20 64/7
100/6 100/8 100/20 124/6	whatever [8] 20/23 25/10 64/3 68/13	72/11 72/13 75/11 91/9 93/9 93/24
vetted [1] 49/21	72/20 78/15 121/16 124/19	101/16 114/5 127/22 130/12
VI [1] 99/10	when [96] 6/5 8/17 11/3 11/9 11/23	Williams [2] 38/12 38/17
viewed [1] 49/20	11/24 13/7 13/16 14/19 16/4 16/9	wise [1] 110/19
VII [1] 99/11	19/18 20/2 22/3 22/14 24/14 24/18	within [14] 21/6 21/6 27/5 27/14 28/25
violation [3] 99/10 108/24 113/10	27/16 31/3 31/19 35/8 36/16 37/18	29/4 30/7 30/19 56/13 64/19 101/20
violations [1] 108/20	38/1 38/6 39/10 44/2 45/5 45/11 45/12	110/17 111/6 122/21
voided [1] 116/1	46/13 49/2 49/25 51/17 52/8 53/4 53/8	witness [2] 5/2 91/20
	55/19 60/12 60/14 60/17 60/21 60/23	witnesses [5] 52/10 52/11 53/5 53/8
W	60/23 61/19 65/2 68/12 68/17 69/20	53/10
W-Y-N-T-R-E-S-S [1] 18/10	69/22 70/14 71/2 71/3 72/17 73/8 77/9	Woodland [1] 3/12
wage [4] 55/17 64/6 64/7 64/10	77/11 78/18 78/21 79/8 83/11 86/19	words [1] 92/21
wait [1] 68/25	90/23 91/2 93/1 93/14 94/5 94/25 96/8	work [17] 9/4 11/3 11/10 15/10 15/14
waived [1] 3/4	96/14 97/18 99/6 100/5 100/7 100/10	15/19 21/7 21/7 34/1 34/15 67/1 77/13
walks [2] 31/4 31/6	101/24 101/25 106/24 107/2 107/5	87/3 92/5 98/11 99/24 124/24
Walmart [3] 9/7 9/9 9/11	108/1 108/12 112/9 113/11 114/2	worked [8] 9/7 9/12 48/15 48/19 49/11
want [26] 13/3 27/25 33/14 33/15 34/8	115/24 118/12 118/13 121/17 123/23	101/11 103/3 131/3
45/3 45/18 47/23 49/13 67/18 67/25	125/2 125/9 130/5 130/9 130/11	workers [3] 91/23 93/23 94/3
71/25 72/7 72/8 72/8 79/10 79/11	130/15	working [4] 11/25 101/10 114/13
81/22 82/25 100/4 102/2 104/7 118/12	where [21] 22/5 32/10 41/18 49/18	114/17
118/24 119/15 120/20	51/15 57/9 58/22 61/9 64/22 67/1 76/7	works [2] 38/24 65/18
wanted [2] 10/15 17/9	76/12 93/12 99/21 100/2 106/12	world [2] 49/17 75/19
wants [3] 65/3 66/8 73/16	113/18 121/9 123/24 129/14 130/6	worthy [1] 119/16
warrant [3] 17/6 17/7 117/21	WHEREUPON [6] 43/5 48/6 74/17	would [204]
warranted [1] 126/16	84/22 85/4 110/1	wouldn't [3] 30/4 46/22 76/17
was [393]	whether [46] 7/22 14/12 22/15 27/19	written [8] 44/11 51/18 52/16 103/21
wasn't [12] 11/23 28/22 29/9 32/10	27/20 32/25 33/5 33/9 33/16 34/24	129/1 129/4 129/10 129/13
32/11 54/9 54/11 78/11 86/1 113/20		

W

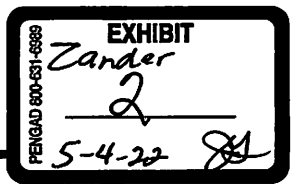
wrongdoing [1] 67/23
wrongful [1] 7/14
wrongfully [1] 8/5
wrote [2] 46/10 109/13
Wyntress [2] 18/9 18/13

Y

y'all [1] 98/17
Yeah [4] 63/18 63/20 101/21 106/22
year [15] 5/19 26/14 45/1 45/17 60/9
70/22 71/1 87/17 87/19 88/4 88/16
88/22 89/7 89/8 115/20
years [6] 10/2 10/17 10/18 36/2 114/2
122/11
yes [91] 5/12 6/8 6/11 7/2 9/5 10/5
14/10 17/1 17/18 19/24 21/7 22/13
24/2 24/4 24/9 24/13 26/7 26/18 26/20
29/17 30/25 34/8 35/16 35/19 37/24
38/19 40/5 41/3 41/7 41/11 42/4 43/4
45/10 47/3 48/12 51/19 52/11 52/14
52/17 53/7 54/7 54/24 59/23 61/4 61/8
65/15 68/8 68/21 72/12 74/25 75/19
76/15 78/5 78/25 83/24 84/9 85/14
86/7 86/10 87/6 87/15 88/23 89/22
90/7 91/1 92/20 94/20 97/20 97/24
98/23 104/18 104/20 104/22 104/25
105/4 105/7 106/25 107/4 108/6
108/22 109/9 109/21 110/8 110/25
114/13 114/21 115/11 126/24 127/14
129/16 129/20
yet [3] 5/19 68/15 102/3
you [574]
you'll [2] 103/22 119/20
you're [26] 8/7 28/4 29/10 29/13 33/4
34/5 35/15 45/21 45/22 67/21 68/5
71/24 72/17 81/10 88/6 90/4 90/25
91/2 92/21 107/4 107/7 109/13 119/18
127/11 130/5 130/6
you've [6] 16/19 16/21 25/8 52/20
89/15 108/1
Young [6] 11/9 11/14 18/10 18/14 87/3
97/6
your [104] 5/5 5/10 5/16 6/2 9/23 11/22
13/21 14/14 15/24 18/20 20/21 21/1
22/3 23/25 24/11 24/18 29/1 29/5 29/5
30/7 30/14 30/22 30/22 31/2 33/4 34/8
39/6 42/5 42/9 43/3 48/5 50/12 50/23
51/8 52/9 53/4 54/18 55/1 55/24 57/4
57/14 57/15 57/20 57/22 58/2 59/8
61/24 62/23 63/2 63/22 63/23 63/25
64/2 64/11 67/12 67/17 67/19 68/3
68/4 70/20 71/10 71/17 73/15 73/21
79/2 80/16 80/23 81/23 82/24 83/6
85/11 85/21 86/18 88/8 88/14 89/20
95/19 96/2 96/3 98/1 99/3 99/8 101/13
102/9 102/15 103/23 105/2 105/12
108/4 109/19 110/17 111/24 112/6
113/2 113/13 120/23 122/11 124/2
125/1 125/23 127/2 127/17 130/8
131/15
yourself [3] 8/21 31/10 108/1

Z

ZANDER [12] 1/24 3/1 4/6 4/8 5/1 5/7
44/2 74/21 95/19 105/2 133/4 133/22



From: Bailey, James K <James.Bailey@mnps.org>
Sent: Wednesday, June 24, 2020 3:41 PM
To: Ann Steiner- Attorney
Subject: Fwd: Formal Complaint

Please see below!

Sent from my iPhone

Begin forwarded message:

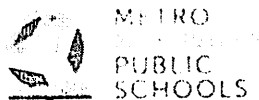
From: "Zander, Mary Ellen" <MaryEllen.Zander@mnps.org>
Date: June 24, 2020 at 3:14:19 PM CDT
To: "Bailey, James K" <James.Bailey@mnps.org>
Cc: "j_kbaily@comcast.net" <j_kbaily@comcast.net>
Subject: RE: Formal Complaint

*Dr. Bailey,
Attorney, Kevin Klein is an outside investigator that will be investigating your concerns. He will likely be reaching out to you once he initiates his investigation.*

Thank you,

Mary Ellen Zander
Director of Employee Relations
Metro Nashville Public Schools
2601 Bransford Ave
Nashville, TN 37204
Office: 615.259.8440 Ext. 858440
MaryEllen.Zander@mnps.org

Leadership Employee Relations Docs



Belief | Arranger | Responsibility | Relator | Individualization

Note: This e-mail may contain privileged and confidential information and is intended only for the use of the specific individual(s) to whom it is addressed. Your receipt of this e-mail is not intended to waive any applicable privilege. If you are not an intended recipient of this e-mail, you are hereby notified that any unauthorized use, dissemination or copying of this e-mail or the information contained in it or attached to it is strictly prohibited. If you have received this e-mail in error, please delete it and immediately notify the person named above by telephone.

From: Zander, Mary Ellen
Sent: Tuesday, June 16, 2020 4:29 PM
To: Bailey, James K <James.Bailey@mnps.org>
Subject: RE: Formal Complaint
Importance: High

Good afternoon Dr. Bailey,

Thank you for sharing your concerns. MNPS takes all concerns of this nature very seriously and will be looking to conduct a formal investigation. Because of the nature of your complaint, it will be handled outside of MNPS HR department. I am still working to identify the investigator. As soon as that individual is identified, I will let you know.

Thank you,

Mary Ellen Zander

Director of Employee Relations

Metro Nashville Public Schools

2601 Bransford Ave

Nashville, TN 37204

Office: 615.259.8440 Ext. 858440

MaryEllen.Zander@mnps.org

Leadership Employee Relations Docs



Belief|Arranger|Responsibility|Relator|Individualization

Note: This e-mail may contain privileged and confidential information and is intended only for the use of the specific individual(s) to whom it is addressed. Your receipt of this e-mail is not intended to waive any applicable privilege. If you are not an intended recipient of this e-mail, you are hereby notified that any unauthorized use, dissemination or copying of this e-mail or the information contained in it or attached to it is strictly prohibited. If you have received this e-mail in error, please delete it and immediately notify the person named above by telephone.

From: Bailey, James K <James.Bailey@mnps.org>

Sent: Monday, June 15, 2020 9:58 PM

To: Zander, Mary Ellen <MaryEllen.Zander@mnps.org>

Cc: j_kbaily@comcast.net

Subject: Formal Complaint

June 15, 2020

Mary Ellen Zander, Director of Employee Relations:

Please accept this written notice as my formal complaint of retaliation, age and race discrimination against Dr. Adrienne Battle. The retaliation is based upon my participation in the Director of Schools', Dr. Adrienne Battle's, brother's disciplinary disposition. The age discrimination is based on me being removed from my position as Principal at Whites Creek High School. Although Dr. Battle alleges that my removal was due to the district's reorganization and budget impact, she is replacing me with someone that is not in a protected age group for my same role. On May 1, 2020, in my meeting with Dr. Chris Barnes, Chief Human Resources Officer, he stated that because I had been at Whites Creek High School for several years they were making a change, yet there are other white high school principals that have been at their schools even longer that were not removed.

Additionally, rumors have been swirling around that I got her brother fired. However, any disciplinary action at that level comes at the recommendation of the Director of Schools. It is my understanding that those allegations against me were also included in Scott Lindsey's complaint and open records request. Keep in mind that Scott Lindsey, former Executive Director of Employee Relations, was the one that was having conversations with Dr. Adrienne Battle's husband, Dr. Darren Kennedy, when the

Carlton Battle investigation was active. Although Scott Lindsey was not assigned to the investigation, Dr. Darren Kennedy was calling me and telling me that Scott Lindsey told him that I had requested an audit of her brother and was trying to get him, Carlton Battle, fired. Although I did not realize that Scott Lindsey was friends with Dr. Battle or Dr. Kennedy, I knew the information regarding the audit and other aspects regarding the investigation Dr. Kennedy was sharing with me was accurate; however, Scott Lindsey should not have been discussing an active case with him per MNPS policy. Shortly after Dr. Battle was officially appointed as the Director of Schools on March 13, 2020, my fear of retaliation became a reality. As a result of the harassment from Dr. Battle's husband and repeated threats from one of the Battle family friend, I had to seek medical attention. Obviously, that fear of retribution and retaliation was real and I am still under a physician's care to this day.

Last, in a letter signed by Dr. Battle states that if I had not secured another position by June 15, 2020, that I would be placed in a classroom teaching position for the 2020/2021 school year. Although I was encouraged to apply for other positions, I never received a call until I sought legal counsel. I did not even get a courtesy call or any type of response for my application for the EDSSI position. Nor had I received any type of response for my Assistant Principal or Principal application for McGavock High School until I sought legal representation. While out on bereavement leave, this past Saturday, June 13, 2020, I received the first response from HR, Lisa Spencer-- Executive Director of HR-- via email. Ms. Spencer was attempting to schedule me for an interview for today, June 15, and I am still out on bereavement leave. Although that communication was not timely, how would anyone expect me to be at my best? How could I be my best self after what Dr. Battle has taken me through, along with the lack of professional courtesy regarding the scheduling of the interview? Again, as soon as Adrienne was appointed as the Director of Schools on March 13, 2020, she wasted no time in retaliating against me for my involvement in her brother's investigation, and the district HR team allowed her to discriminate against me based on my age and race by appointing someone younger with less experience and not subjecting the white principals to the same humiliation because of the length of their assignments. As result of these actions, my last day with the district will be June 30, 2020.

Respectfully,

Dr. James K. Bailey